

**In the Matter Of:**

**UNITED STATES vs STATE OF GEORGIA**

1:16-CV-03088-ELR

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**TALITHIA NEWSOME**

*July 12, 2022*

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July 12, 2022

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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF GEORGIA  
3 ATLANTA DIVISION

4 UNITED STATES OF AMERICA,

5 Plaintiff,  
6 vs.

CIVIL ACTION NO.  
1:16-CV-03088-ELR

7 STATE OF GEORGIA,

8 Defendant.

9 Videotaped deposition of TALITHIA NEWSOME, taken on  
10 behalf of the Plaintiff, pursuant to Notice and  
11 agreement of counsel, in accordance with the Federal  
12 Rules of Civil Procedure, before Maureen S. Kreimer,  
13 CCR, CRR, Notary Public, at 864 Broad Street, Augusta,  
14 Georgia on July 12, 2022 between the hours of 9:15  
15 a.m. and 6:47 p.m.

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(APPEARANCES CONTINUED NEXT PAGE)

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(Whereupon, disclosure as required by the Georgia Board of Court Reporting having been made by the court reporter, a written copy of which is attached hereto.)

THE VIDEOGRAPHER: Good morning. Today's date is July 12th, 2022. This is the deposition of Talithia Newsome, director of Sand Hills GNETS program. This deposition is being taken at the Richmond County Board of Education in Augusta, Georgia. The court number, file number is 116CV03088-ELR. The time is 9:16 Eastern.

I'm your videographer Summer Menke with Esquire Deposition Solutions. Our court reporter is Maureen -- and if you could say your last name, Maureen.

REPORTER: Kreimer.

THE VIDEOGRAPHER: We are both with Esquire Depositions today. If all attorneys in the room announce their names and whom they represent, then will the Zoom parties announce their names for the record and who they represent, then our court reporter will swear in the witness.

MS. FLETCHER BOWDEN: Kim Fletcher Bowden, attorney for the Richmond County School System.

MR. FLETCHER: Pete Fletcher, attorney for

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1 the Richmond County Board of Education.

2 MS. HAMILTON: Andrea Hamilton, attorney for  
3 the United States.

4 MS. GARDNER: Kelly Gardner, attorney for  
5 the United States.

6 TALITHIA F. NEWSOME,  
7 having been first duly sworn, was examined and  
8 testified as follows:

9 REPORTER: You can proceed, Counsel.

10 EXAMINATION

11 BY MS. HAMILTON:

12 Q. Good morning, Ms. Newsome. How are you  
13 today?

14 A. Good morning. I'm fine.

15 Q. My name is Andrea Hamilton, and I represent  
16 the United States. I'll be taking your deposition  
17 today.

18 Will you please state your full name for the  
19 record?

20 A. Talithia Franceta Newsome.

21 Q. I'll be asking you a series of questions,  
22 and as you heard, you're under oath to provide  
23 complete and honest answers to those questions.

24 Do you understand?

25 A. I understand.



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1 Q. If you do not understand a question that I  
2 ask, you should feel free to let me know and I will  
3 try to rephrase that question, okay?

4 A. Okay.

5 Q. Also, if you're not sure of an answer or  
6 don't have a complete answer, you must still answer  
7 the question to the extent that you can, okay?

8 A. Okay.

9 Q. If you need to break at any point, please  
10 tell me or your attorney. We will let you finish your  
11 answer if you're in the midst of answering a question,  
12 and then we can discuss when or if to break, is that  
13 fine?

14 A. That's fine.

15 Q. And we'd also discussed with your attorney  
16 that we'll likely take a break probably roughly every  
17 90 minutes or so, and we'll also break midday for  
18 lunch.

19 A. Okay. Great.

20 Q. As you can see, the court reporter is  
21 recording all that's being said here. Because she can  
22 only record our words, we just ask that you speak  
23 clearly and answer every question with a verbal  
24 response.

25 Do you understand?

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1 A. I understand.

2 Q. Also, I want us to avoid talking over each  
3 other. I don't anticipate that being a major issue,  
4 but just so that you know, I'll try not to interrupt  
5 you when you're answering questions, and I'd just ask  
6 that you try to do your best to let me finish my  
7 questions before you start to answer, okay?

8 A. Okay.

9 Q. Is there any reason that you can think of  
10 that you would not be able to answer any of my  
11 questions fully and truthfully?

12 A. I can't think of any unless I just don't  
13 know.

14 MS. HAMILTON: And then before we get  
15 started, I do just want to note on the record  
16 that the United States and counsel for the  
17 witness, and also the State of Georgia in our  
18 prior depositions, have agreed that all  
19 objections except as to form and responsiveness  
20 and privilege will be reserved until trial.

21 So I am handing the court reporter what I  
22 would like to have marked as Plaintiff's  
23 Exhibit 192.

24 (Plaintiff's Exhibit P-192 marked.)

25 BY MS. HAMILTON:

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1 Q. All right. You've just been handed  
2 Plaintiff's Exhibit 192. This is a subpoena to  
3 testify at a deposition in a civil action, and the  
4 subpoena is directed to Talithia Newsome. Do you see  
5 that?

6 A. I do.

7 Q. Okay. Is that you?

8 A. It is.

9 Q. Have you seen this document before today?

10 A. I have.

11 Q. Okay. Were you served with this document at  
12 home?

13 A. No.

14 Q. Okay. Were you served with it at another  
15 location?

16 A. It was -- I was at work.

17 Q. Okay. And you're here today on account of  
18 this document?

19 A. That is correct.

20 Q. If you note at the top of this document do  
21 you see where it says case name United States versus  
22 State of Georgia?

23 A. Yes.

24 Q. Do you understand that this deposition is  
25 being taken in connection with litigation against the

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1 State of Georgia relating to the Georgia Network for  
2 Educational and Therapeutic Support program?

3 A. I do.

4 Q. Are you aware that this program is commonly  
5 referred to as a GNETS program?

6 A. Yes.

7 Q. So if I use the term "GNETS" throughout the  
8 day, you'll understand that I'm referring to the  
9 Georgia Network for Educational and Therapeutic  
10 Support program?

11 A. I will understand that.

12 Q. When did you first learn about the GNETS  
13 litigation?

14 A. I guess around 2015-2016. I'm not sure of  
15 the exact date.

16 Q. That's fine. And how did you learn about  
17 it?

18 A. During that time I was the special ed  
19 director for one of those school systems, and we were  
20 asked to assist with preparing information to respond  
21 to the initial litigation.

22 Q. Okay. What's your understanding of what the  
23 case is about?

24 A. My understanding is that it's a case  
25 regarding I'm going to almost say civil rights, and

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1 whether or not we're housing students long-term,  
2 whether or not the students have equity and access to  
3 the same types of resources that students and the  
4 school systems have available to them, are we housing  
5 students for a long period of time without giving them  
6 the opportunity to transition back to their least  
7 restrictive environment, do they get quality services,  
8 do they have access to the curriculum that all -- you  
9 know, without segregation.

10 Q. What did you do to prepare for this  
11 deposition?

12 A. Well, I decided I was going to attempt to  
13 study for it by looking at some of the documents that  
14 I had submitted previously. And then I just said you  
15 know what, I'm just going to have to answer the  
16 questions based on my experiences with the program,  
17 based on what we do every single day.

18 And I listened to a lot of gospel music.

19 Q. And when you say you looked at some of the  
20 documents that were submitted previously, which  
21 documents are you referencing?

22 A. We received a subpoena last fall, and there  
23 were a number of documents that had to be submitted.

24 And so I reviewed those documents in case  
25 those were to come up today so I could make sure that

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1 I was familiar with anything that might come up, and  
2 also to determine whether or not there had been any  
3 changes made between when those documents were  
4 submitted until this day.

5 Q. Okay. Great. Did you meet with counsel?

6 A. I did.

7 Q. And who was present during those meetings?  
8 Was it just your attorneys, or anyone else?

9 A. Just the attorneys.

10 Q. Did you speak with anyone else in  
11 preparation for the deposition?

12 A. I did. I basically went through and read  
13 some of the prior letters that had been available  
14 that's on public domain.

15 Q. And when you say "prior letters," can you  
16 give me some examples?

17 A. When you do a Google search you actually --  
18 and type in GNETS, some of the responses will come up  
19 about decisions that have been made, or news articles  
20 that are out there about the case overall. So I had  
21 an opportunity to look through some of those.

22 Q. Okay. Did you review any of the other  
23 deposition transcripts in connection with this case?

24 A. No, I did not.

25 Q. Did you do anything else to prepare?

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1 A. I did not.

2 Q. Have you ever had your deposition taken  
3 before?

4 A. I have not.

5 Q. Okay. So this is the first time?

6 A. It is.

7 Q. All right. And then, lastly, just for  
8 introduction purposes I may be using some acronyms  
9 today for brevity. And so I wanted to run through a  
10 few of those now to make sure we're on the same page.

11 When I use the acronym, when I say GaDOE,  
12 would you understand that I'm referring to the Georgia  
13 Department of Education?

14 A. I will.

15 Q. If I use the acronym "LEA," would you  
16 understand that I'm referring to Local Education  
17 Agency?

18 A. I will.

19 Q. If I use the acronym R-E-S-A for RESA, would  
20 you understand that I'm referring to the Regional  
21 Educational Service Agency?

22 A. I will.

23 Q. If I say GNETS Centers, would you understand  
24 that I'm referring to separate standalone GNETS  
25 locations?

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1 A. I will.

2 Q. I don't believe this is relevant for Sand  
3 Hills, but if I do refer GNETS school-based locations  
4 would you understand that those are GNETS locations  
5 that are based in general education settings or public  
6 schools?

7 A. I will.

8 Q. If I use "PBIS," will you understand that  
9 I'm referring to positive behavioral intervention and  
10 supports?

11 A. Yes, I will.

12 Q. If I use the acronym "EBD," would you  
13 understand that I'm referring to emotional and  
14 behavioral disabilities?

15 A. I will.

16 Q. And if I use the term "general education  
17 settings," would you understand that I'm referring to  
18 public schools in Georgia where children with EBD and  
19 other behavioral health conditions receive education  
20 -- sorry -- receive instruction services alongside  
21 children who don't have disabilities?

22 A. I will.

23 MS. HAMILTON: All right. I am handing the  
24 court reporter what I would like to have marked  
25 as Plaintiff's Exhibit 193.



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1 (Plaintiff's Exhibit P-193 marked.)

2 BY MS. HAMILTON:

3 Q. And you've just been handed Plaintiff's  
4 Exhibit 193. This is a copy of the résumé for  
5 Talithia Newsome that was provided to the United  
6 States by counsel Leonard Fletcher on June 29, 2022  
7 via email.

8 Do you recognize this document?

9 A. I do.

10 Q. Okay. Would you represent that this is an  
11 accurate copy of your résumé?

12 A. Yes.

13 Q. Okay. So I'd like to just walk through your  
14 educational and professional background. And just  
15 starting with your educational history, what is the  
16 highest level of education --

17 A. Educational specialist.

18 Q. -- that you've obtained?

19 A. Educational specialist.

20 Q. Sorry.

21 A. Educational specialist.

22 Q. Educational specialist. The highest degree  
23 that you've obtained?

24 A. Educational specialist, a six-year degree.

25 Q. And where and when did you receive that?

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1 A. Oh, goodness. Troy State University in  
2 2005.

3 Q. And then what other graduate or professional  
4 degrees have you obtained? It looks like you have a  
5 few.

6 A. I have got a master's degree from  
7 Northwestern State University in Special Education in  
8 the area of Mild Disabilities. And then I had an  
9 add-on certification that was done through Troy State  
10 University in Educational Leadership and Supervision.

11 Q. Okay. And the Master of Education you  
12 received in 1997, and the add-on certification in  
13 2000?

14 A. Yes.

15 Q. Okay. And where did you go for college?

16 A. Georgia Southern University in Statesboro,  
17 Georgia.

18 Q. Okay. What was your major?

19 A. Special Education and Early Childhood.

20 Q. And you graduated in 1991?

21 A. Yes.

22 Q. You currently work as the Sand Hills GNETS  
23 director; is that correct?

24 A. That's correct.

25 Q. How long have you been in that position?

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1 A. Since about two-and-a-half years, a little  
2 over two-and-a-half years.

3 Q. Okay. And is January '22 -- sorry --  
4 January 2020 the exact month that you started it?

5 A. Is the exact month I started.

6 Q. Okay. Great. So before serving in this  
7 role -- actually, it looks like you've worked for the  
8 Richmond County Board of Education for a number of  
9 years.

10 A. I have.

11 Q. What was your position immediately before  
12 your current role?

13 A. I worked as an administrative assistant  
14 providing support to the GNETS program.

15 Q. Okay. And what was the time frame for that?

16 A. From November -- November -- October of 2019  
17 -- 2020 -- '19 until January of 2020.

18 Q. Okay. Did you say October?

19 A. Well, it -- actually I started that  
20 November.

21 Q. Okay. And what did you do in that role?

22 A. There was a coordinator who was out on  
23 medical leave during that time, so I kind of -- I went  
24 out, started out kind of shadowing her to see how the  
25 program was working so that I could assist when she

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1 went out for medical leave. And so she was out from  
2 December through January.

3 Q. Okay. What were your job responsibilities  
4 serving as the administrative support?

5 A. Providing administrative support if they  
6 need it; any type of activities or duties that the  
7 leadership staff would do, I did those as well. I  
8 attended leadership meetings, chaired IEP meetings,  
9 eligible meetings. I worked with the staff providing  
10 professional learning.

11 Q. Okay. And when you say you provided support  
12 to the staff, were these special education staff in  
13 particular?

14 A. Yes. Special ed teachers, the GNETS  
15 coordinator and the GNETS director at the time.

16 Q. Okay.

17 A. The therapeutic support providers as well.

18 Q. Okay. What was your involvement with the  
19 GNETS program specifically in that role?

20 A. As the administrative support?

21 Q. Yes.

22 A. To provide support primarily for when the  
23 GNETS coordinator went out on medical leave. I guess  
24 they wanted to make sure that there was some  
25 administrative staff on site during that time to

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1 support the teachers and the students while they were  
2 out there.

3 Q. And on a day-to-day basis, what did your  
4 responsibilities look like for GNETS specifically when  
5 you did that?

6 A. I can tell you just general. It changed  
7 every single day.

8 Q. That's fine, yeah.

9 A. Probably I'd come in, make sure the staff  
10 was in there, check on the students, monitor when the  
11 busses got there, monitor the students as they came  
12 in, check on the staff to see if they needed anything.  
13 If there were needs that the participating school  
14 systems had at the Center site in Thomson, I would  
15 address those. If they needed observations, I would  
16 schedule those.

17 Part of the process for referring a child is  
18 to have them turn in those pre-referral packets or  
19 consideration packets is what we call them. I would  
20 review those, if there was information that I had  
21 questions about I would go back and follow up with  
22 them. If they needed observations that were done on  
23 site, I might schedule observations.

24 I scheduled the meetings, worked back and  
25 forth with the different special education directors

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1 to ensure we had the right people attending the  
2 meetings. I also corresponded with the parents  
3 as-needed, basically providing support, administrative  
4 support, as if the coordinator was still there.

5 Q. Okay. And the when you say GNETS  
6 coordinator, is that the person who's essentially like  
7 the site-based person responsible for a particular  
8 GNETS --

9 A. It is.

10 Q. -- program?

11 A. Mm-hmm (affirmative).

12 Q. So it looks like you did that, as you were  
13 saying, for about three months or so?

14 A. Mm-hmm (affirmative).

15 Q. Before you held that role what was your  
16 position with the Richmond County Board of Ed?

17 A. Special Education director.

18 Q. And what was the time frame that you were in  
19 that role?

20 A. Oh, goodness. Probably about nine years or  
21 something like that. From August 2009 until  
22 October 2019.

23 Q. Okay. What were your responsibilities as a  
24 Special Education director for the County?

25 A. Oh, wow, very extensive. So I would -- my

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1 primary function was to supervise and monitor the  
2 programs for students with disabilities to make sure  
3 that they were getting their specially designed  
4 instruction.

5 But along with that came with a lot of  
6 professional learning and support for administrators,  
7 for teachers, for parents, supervising and monitoring  
8 the budget, making sure that the students received  
9 their related services, providing support and  
10 assistance when it came to hiring, recruiting and  
11 retaining special education staff and support  
12 providers. There is so many. Monitoring compliance,  
13 making sure that we were doing the things that we  
14 needed to do as far as compliance. Updating  
15 procedures and practice and policies. Whenever  
16 changes were made, making sure that, again, we provide  
17 information to the staff and the students and their  
18 parents regarding any changes that might have taken  
19 place. That's primarily what I did.

20 Q. Okay. And in that role what were your  
21 responsibilities specifically as it pertained to the  
22 GNETS program?

23 A. In that capacity we would work with  
24 school-based staff as well as Central Office staff on  
25 ensuring that if there was a referral that we needed

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1 to make for consideration of services that we had all  
2 that information ready and available.

3 The other part was making sure that we  
4 provided the training of professional learning for the  
5 teachers, the staff and the parents about what the  
6 program is and what the referral process looks like,  
7 and what types of students should be considered for  
8 that program.

9 We also as the Special Education director  
10 made sure that any resources and materials that the  
11 students received within our school system that the  
12 students who were participating in the GNETS program  
13 received those same types of same access to those  
14 resources; that includes the teachers as well.

15 If we had parent mentor to parent mentors  
16 for everybody in the school system, and that included  
17 the parents and students in GNETS. So make --  
18 primarily making sure that people understood the  
19 process, and also ensuring that the students had  
20 access to the same resources as well as the staff had  
21 access to the same resources.

22 Q. Okay. So prior to that what was -- what was  
23 your job -- I guess what was your job title prior to  
24 serving as Special Education director?

25 A. I was a special education and gifted



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1 coordinator. I should say and gifted coordinator.

2 Q. Okay.

3 A. But I also in that capacity served as the  
4 LEA representative for GNETS. And basically whenever  
5 we had a consideration meeting I would serve as a  
6 representative for the LEA at the time.

7 As a special education coordinator, my role  
8 was to provide direct support and carry out the duties  
9 and responsibilities that the special ed director  
10 assigned to me.

11 I was assigned specific schools that I  
12 worked with. I did a lot with making sure that we had  
13 accurate FTE information. And the FTE is what we use  
14 to collect the data as well as obtain our financial  
15 funding from the State and from the federal  
16 government.

17 Definitely responsible for a lot of  
18 professional learning, directly responsible. Making  
19 sure that we had the right amount of -- I monitor the  
20 staffing. I monitor the transportation. Goodness.  
21 And then I guess I won't talk about the gifted, but  
22 supervised and monitored the gifted program for the  
23 school system.

24 Q. And when you served as the gifted  
25 coordinator and the LEA representative for GNETS, what

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1 was the time frame?

2 A. From August '20 -- I mean -- I'm sorry.  
3 From August 2002 to August 2009.

4 Q. Okay. And all of the positions that you've  
5 talked through so far have been with the Richmond  
6 County Board of Education; is that correct?

7 A. Yes, ma'am.

8 Q. And when you served as the gifted  
9 coordinator in that capacity did you have any specific  
10 responsibilities related to GNETS?

11 A. Only if there might have been a student who  
12 was referred for -- in the gifted program who was  
13 referred for GNETS. But the other part is we did have  
14 some students in the gifted program who received  
15 services support through gifted programs, making sure  
16 that they got those services. We didn't take those  
17 away because they were enrolled in Sand Hills GNETS.

18 Q. Do you know, roughly, just a rough estimate  
19 like approximately how many students you might have in  
20 GNETS --

21 A. I can only think of --

22 Q. -- participating?

23 A. I'm sorry. Ask again.

24 Q. No worries.

25 Approximately how many students in GNETS who

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1 you would have been working with in terms of  
2 coordinating gifted services?

3 A. I can only think of one off the top of my  
4 head today.

5 Q. During that time frame that you served?

6 A. During that time frame, yes.

7 Q. And that was 2022 to 2009. Okay.

8 All right. So prior to serving in that  
9 capacity, what other work experience did you have?

10 A. I worked as a -- at the time what we called  
11 special education consultants where I was assigned to  
12 work specifically with schools; again, a lot of  
13 professional learning, a lot of monitoring data,  
14 especially discipline data, making sure that the FT  
15 information that we were collecting from those schools  
16 that I was assigned was accurate. Working with the  
17 students, excuse me, the staff, providing support,  
18 especially for new teachers, a lot of new teacher  
19 support.

20 I also served or worked as a special  
21 education teacher both in Richmond County and in the  
22 state of Alabama, I worked with students in Alabama.  
23 I worked with students who were identified -- so  
24 educable mentally retarded, so EMR teacher.

25 During that role I served as the, I guess,

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1 chairperson to the Student Support Team. I was the  
2 lead special education teacher. I did that for nine  
3 years. I also served as the district Student Support  
4 Team coordinator when I was in Alabama.

5 Q. Okay. And just to make sure I capture a few  
6 details, when you served as a spec consultant, that  
7 was for Richmond County; correct?

8 A. Yes. Mm-hmm (affirmative).

9 Q. And what was the time frame for that?

10 A. One moment. August 2001 to August 2002.

11 Q. Okay. And what were your responsibilities  
12 as the special education consultant as it pertained to  
13 GNETS specifically?

14 A. Other than assisting schools with preparing  
15 those consideration packets, that would have that  
16 would have been my only role with that, and then  
17 attending those consideration meetings.

18 Q. So is the special education consultant role  
19 similar to the special education coordinator role?

20 A. No. The special education consultant or  
21 program specialist would be right under the special ed  
22 coordinator.

23 Q. Okay. And when you were working as a  
24 teacher it looks like it says here on your résumé you  
25 were a teacher in Richmond County from August 2000 to

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1 June 2001; is that correct?

2 A. That's correct.

3 Q. Okay. And then when you were in Alabama, it  
4 looks like you were working as a teacher from  
5 August 1991 to June 2000?

6 A. That's correct.

7 Q. Okay. Great. So I'd like to return now  
8 back to your current role --

9 A. Okay.

10 Q. -- as the director of the Sand Hills GNETS  
11 program. What are your general duties and  
12 responsibilities in that role?

13 A. They are very similar to the role as a  
14 Special Education director, monitoring, supervising  
15 the program and services for the students who are  
16 participating in the program.

17 I do a lot of collaboration with the  
18 participating school systems, their directors, as well  
19 as communicating with the superintendents for those  
20 schools about things that are coming. Meeting with  
21 special ed leadership staff; conducting observations  
22 in the classrooms; participating in state meetings  
23 whether they are virtual, or -- well, we haven't had  
24 any face to face since I have been here except for one  
25 -- attending those face to face meetings; keeping

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1     abreast of any changes that might be taking place,  
2     making sure that the resources that the staff need and  
3     the students need are in place; ensuring that  
4     professional learning is provided; monitoring the  
5     funding.

6             And we have a strategic plan that we  
7     implement, so we're making sure that we are  
8     maintaining our data and documentation work in our  
9     strategic plan.

10            I participate in district level meetings to  
11     ensure that whatever types of procedures, policies or  
12     practices for those participating school systems are  
13     being followed. Oh, and meeting with the parents. I  
14     do that too. Can't forget that. And sometimes  
15     subbing, so go into classrooms and sub as well.

16            (Plaintiff's Exhibit P-194 marked.)

17     BY MS. HAMILTON:

18            Q.     I'm going to hand the court reporter what  
19     I'd like to have marked as Exhibit 194. And I have  
20     just handed you Plaintiff's Exhibit 194 as well.

21            This is a copy of the Sand Hills program's  
22     response to Item 14 in the United States subpoena to  
23     produce documents dated August 20, 2021.

24            A.     Mm-hmm (affirmative).

25            Q.     You'll also notice at the bottom, the first

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1 page of this document was stamped using a unique  
2 identifier from the Sand Hills program: 000782.

3 Are you familiar with this document?

4 A. I am.

5 Q. What is it?

6 A. I think this is information about what we  
7 have access to, and as far as -- is this the wrongful  
8 reporting?

9 Q. Yes.

10 A. Okay. The reporting structure, yes.

11 Q. Okay. Did you help create this document?

12 A. I created the document.

13 Q. You created it. Great. So that means you  
14 are familiar with it?

15 A. Yes, I am familiar with it.

16 Q. Okay. And you'll see here at the top to  
17 what you were just saying, Item No. 14 asks your  
18 program to provide documents --

19 A. Mm-hmm (affirmative).

20 Q. -- reflecting the reporting structure from  
21 your GNETS program to any LEA, RESA, or to the  
22 State --

23 A. Mm-hmm (affirmative).

24 Q. -- including those relating to funding  
25 grants, training and monitoring.

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1 A. Mm-hmm (affirmative).

2 Q. So what I'd like to do is walk through this  
3 document and just talk through basically the various  
4 ways that you report to or meet with individuals from  
5 each of these different entities.

6 As you'll see, and as you know, each row  
7 here represents a different agency. So the first row  
8 is your meetings or communication or reporting to the  
9 LEA, the next row is to the RESA. The next row is to  
10 the GLRS, and the last row involves your meetings and  
11 communications with the State; correct?

12 A. Yes.

13 Q. Okay. So starting with the LEA, you mention  
14 here under the Description column that there are  
15 "monthly meetings with system administrators from all  
16 of the participating schools."

17 A. Mm-hmm (affirmative).

18 Q. And you also say here: "The meeting  
19 includes information that may impact the operation of  
20 the program."

21 When you reference "program," are you  
22 referring to your GNETS program?

23 A. That's correct.

24 Q. Okay. Can you explain to me -- and I think  
25 you were referring to this a moment ago, these



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1 meetings with the system administrators -- what is the  
2 purpose of these meetings?

3 A. So actually all of them are tied together.

4 Q. Okay.

5 A. We have monthly meetings with GLRS. They  
6 schedule meetings with all of the special ed  
7 stakeholders -- excuse me -- Special ed stakeholders  
8 in the area. And I'm actually on the agenda every  
9 month to present or do a report about what's going on  
10 in the program. And so we have -- excuse me --  
11 representatives from RESA. We have all the special  
12 education directors and their administrative team that  
13 they invite to the meeting, as well as community  
14 agencies where whether it's Augusta State, Vocational  
15 Rehabilitation Services from Georgia, Developmental  
16 Disabilities, they are all there. And we just report  
17 our information and share information about our  
18 program. That information could include information  
19 about funding, any additional funding that we  
20 received, any additional funding we may be losing. We  
21 talk about the students who are being referred.

22 I share with them information about who is  
23 going to -- the students who are being referred, the  
24 number of referrals, and I share information about  
25 enrollment. And then I always give them opportunity

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1 to ask any questions.

2 If there is information that I received from  
3 the State about what's going on with the GNETS  
4 program, I share that information with them as well.  
5 And that's done each month. And those meetings have  
6 been virtual since I have been on board.

7 MS. FLETCHER BOWDEN: And not to interrupt,  
8 but there is a battery low warning on the laptop.

9 THE VIDEOGRAPHER: It's plugged in okay.  
10 (Comments off the record.)

11 REPORTER: Do you want to go off the record,  
12 Counsel?

13 THE THE VIDEOGRAPHER: We can go off the  
14 record for a minute. Okay. Off the record at  
15 9:45 -- 9:46 a.m.

16 (Recess 9:46 p.m. - 10:18 a.m.)

17 THE VIDEOGRAPHER: Back on the record at  
18 10:18 a.m.

19 BY MS. HAMILTON:

20 Q. Ms. Newsome, when we left off we were  
21 talking about Exhibit 194. And you were explaining  
22 that there are monthly meetings held by GLRS in which  
23 the system administrators and others participate;  
24 correct?

25 A. That's correct.

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1 Q. And what is GLRS?

2 A. It's a resource center for staff, parents  
3 who -- I work with students with disabilities, they  
4 provide a lot of support and professional learning to  
5 the participating school systems in the region.

6 Q. Do they fall under a particular agency?

7 A. They fall under different agencies, to my  
8 knowledge. And I don't have a lot of knowledge about  
9 them. The one in our area falls under RESA. And they  
10 work for the Department of Education, GaDOE.

11 Q. Do you know where they get their funding  
12 from?

13 A. The State funding attach, but I'm not  
14 positive.

15 Q. Okay. And I know that you were saying that  
16 there is some overlap between the meetings that are  
17 referenced on this document. So under the row for LEA  
18 Reporting it says "monthly meetings with system  
19 administrators"?

20 A. Mm-hmm (affirmative).

21 Q. On the second page where it says GLRS it  
22 also says "monthly meetings with special education  
23 directors"?

24 A. Mm-hmm (affirmative).

25 Q. Is that the same meeting, or a different

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1 meeting?

2 A. It is. Remember I said it was a combination  
3 of different agencies and departments and programs.  
4 They all participate in the same monthly meeting.

5 Q. Okay. Also, on the first page under the  
6 RESA entry you mentioned the Board of Control has  
7 monthly meetings?

8 A. Yes.

9 Q. Is this the same meeting, or a different  
10 meeting?

11 A. This is a different meeting. This  
12 particular meeting would have superintendents there.  
13 And, again, I'm a line item on the agenda where I  
14 present the same type of information that I present to  
15 the LEAs and to GLRS.

16 Q. Okay. So I'll go back to this first meeting  
17 that we were discussing involving the LEA GLRS. You  
18 said the RESA is present, someone from the RESA is  
19 present at that meeting?

20 A. Yes.

21 Q. Okay. Who would that person be?

22 A. So we have multiple people, but the person  
23 who's over RESA is Dr. Debbie Alexander, she's  
24 present. And then various departments in each area  
25 that she falls under her responsibility, she would

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1 make sure that those areas are covered on the agenda.

2 Q. And what is Dr. Alexander's role?

3 A. I don't know her title --

4 Q. Her title.

5 A. -- specifically, but she is, I'm going to  
6 say, the director for the RESA program in the area.

7 Q. Okay. What RESA does Sand Hills fall  
8 underneath?

9 A. I think it's called a CSRA RESA.

10 Q. And just to make sure I'm clear, is Richmond  
11 County School District the fiscal agent for the GNETS  
12 program?

13 A. It is.

14 Q. Okay. So what would be the RESA's role in  
15 connection with GNETS, if it's not the fiscal agent  
16 here?

17 A. Again, providing that support. And also  
18 when it's time to report our information to those  
19 people, those participating school systems, I can do  
20 that during their meetings. But primarily they  
21 provide professional learning to our staff as well.  
22 Any type of resources or access to services that they  
23 provide for school systems, we're included in that as  
24 well.

25 Q. Okay. All right. So also underneath the

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1 LEA entry, so you have the monthly meetings and you  
2 talked us through what you present on during those  
3 meetings, do you receive information about the GNETS  
4 program during those meetings, or are you mainly just  
5 reporting out?

6 A. I'm mainly reporting out for those for the  
7 LEA.

8 Q. Okay.

9 A. LEAs.

10 Q. All right. For the LEA you also mentioned  
11 that there are quarterly meetings scheduled with  
12 finance. Can you tell me about those?

13 A. Yes. Because we have -- Richmond County  
14 serves as our fiscal agent what we do is we schedule  
15 quarterly meetings to review the funding, looking at  
16 where money is being spent, whether or not I need to  
17 make some adjustments to the budget, and then just  
18 make sure we're on track and providing all of the  
19 spending requirements that are provided to us.

20 Q. And just to clarify, for the monthly  
21 meetings that you're referring to does anyone from the  
22 State Department of Education participate in those?

23 A. For the ones, for the RESA, as well as the  
24 GLRS, we always have our person present that's from  
25 the State.

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1 Q. So for the GLRS meeting who from the State  
2 participates in those?

3 A. It would be our district liaison. And I  
4 think her name is -- I just remember her first name is  
5 Myesha. I don't know her last name. It just left me.

6 Q. Okay. So Myesha, and she's a district  
7 liaison for the State Department?

8 A. For this area.

9 Q. For this area?

10 A. Mm-hmm (affirmative).

11 Q. From the State Department of Education?

12 A. Mm-hmm (affirmative).

13 Q. And then is there anyone from the State  
14 Department of Education who participates in the  
15 quarterly meetings?

16 A. No. That's a local meeting that we do  
17 between the person who's assigned to help monitor our  
18 grant through the LEA.

19 Q. Okay. What about the annual budget  
20 meetings?

21 A. There is not anybody from the State that I'm  
22 aware of. That's basically when I go in and present  
23 information about the funding that we received, and  
24 the plan for budgeting that money for the upcoming  
25 school year.

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1 Q. Okay. And who participates in those  
2 meetings?

3 A. Typically it would be my direct supervisor.  
4 It would be a representative from finance and  
5 accounting. And then it would be myself. And  
6 sometimes we have either the director or the assistant  
7 director for finance.

8 Q. And when in the school year do those  
9 meetings take place?

10 A. Typically we start meeting around January,  
11 and they might last between January and February or  
12 March. If we need to come back because I need to make  
13 some adjustments, we may come back and reschedule  
14 another meeting if we needed to.

15 Q. So is there more than one budget meeting?

16 A. There is a possibility to have more than  
17 one.

18 Q. Okay. And by the time you-all have finished  
19 having those meetings, have you set the budget and  
20 made any other decisions that need to be made in  
21 connection with finances for the GNETS program?

22 A. We will have done that, yes.

23 Q. And you said no one from the State  
24 Department of Education participates?

25 A. No, not since I have been working that area.



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1 Q. And then you also note here that there are  
2 planning meetings that are conducted with the  
3 departments. Of what departments are you referring  
4 to?

5 A. So when I say -- I probably should have said  
6 with the different systems that participate. So if  
7 there is like -- I'll give you an example. We needed  
8 to have -- well, it is departments.

9 So like I might have to do something with  
10 information technology. And one of those things would  
11 be like if I needed to update the equipment in the  
12 school I might talk to IT, or talk about, you know,  
13 what's needed, how much that's going to cost, have  
14 them work with me to get an estimate so that I could  
15 have that information ready for the budget meeting; as  
16 well as personnel, if I am seeing that I need some  
17 additional staff, I would then consult with human  
18 resources to talk about the staffing, talk about the  
19 funding so I could, again, have that ready for  
20 personnel.

21 Q. And it looks like here you also mention that  
22 as part of these planning meetings sometimes you're  
23 providing professional learning and support.

24 A. Mm-hmm (affirmative).

25 Q. As well as receiving professional learning

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1 and support. What does that look like?

2 A. So we do -- that's a part of the  
3 consolidated application. And let me go back and make  
4 a correction. For those meetings, the State is  
5 involved and we will have like virtual meetings, we  
6 used to have them face to face, where they'll talk  
7 about how we need to develop the system budget. And  
8 the State is involved with that one because they do  
9 the professional learning on that piece.

10 Once I get the professional learning about  
11 what we need to do to develop the budget for the  
12 upcoming school year, I then in turn share that with  
13 the staff who help me prepare the budget for the  
14 upcoming school year.

15 Q. Okay. So just to make sure I understand, so  
16 as part of these planning meetings there is a planning  
17 meeting with representatives from the State Department  
18 of Education?

19 A. Right. They actually do the professional  
20 learning for preparing for the consolidated  
21 application.

22 Q. Okay.

23 A. And that is a part of the big budget for  
24 each school system.

25 Q. And what is the consolidated application?

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1 A. Oh, gosh, it's been so long since I have  
2 done the whole thing. So I'm going to give you my  
3 generic overview.

4 Basically it's a plan that each school  
5 system develops to talk about what they plan for the  
6 upcoming school year. It includes information from  
7 the various different programs and departments within  
8 the schools, the school system.

9 Along with that before you can get your  
10 budget approved you have to have that piece in; like  
11 what are we going to do for students with  
12 disabilities, what are we going to do for migrant --  
13 not migrant workers, but homeless students.

14 And so there are different federal programs  
15 that write in what they're going to do, and then and  
16 submit the budget so it's all one big consolidated  
17 application with all of that included.

18 Q. Okay. And who from the State leads or  
19 coordinates these meetings?

20 A. I don't know who coordinates it, but they  
21 would have various representatives from all of the  
22 different programs. Like they might have the finance  
23 person from the Special Education department at GaDOE,  
24 they might have the Homeless liaison from GaDOE. I  
25 think one of the -- the Special Grants, they would

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1 have that representative.

2 And basically they talk to us about what  
3 they expect for the grant to include, how we should  
4 write things up, and give us an opportunity to ask any  
5 questions that we might have.

6 Q. Okay. And is this meeting just for your  
7 GNETS program, or are there other GNETS directors  
8 participating in these meetings?

9 A. It's for the State, and I would imagine that  
10 all GNETS directors would be participating in there.  
11 But I can't answer that for sure. I know they do  
12 here.

13 Q. Okay. So like I know you're saying it's a  
14 virtual meeting. So you're on the screen. Are there  
15 -- it sounds like there are a lot of other people who  
16 are participating?

17 A. Yes. And they also send out an agenda for  
18 that. And you would kind of be able to gauge when you  
19 need to be logging in because sometimes the meeting  
20 takes all day.

21 Again, prior to COVID it would be a face to  
22 face meeting where we would go on site maybe to  
23 Atlanta, or Macon, and then we would attend those  
24 sessions that applied to our program specifically.

25 Q. And what time of year does that meeting take

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1 place?

2 A. Typically they might start in May, and --  
3 because we have to have a consolidated application  
4 completed by the end of July.

5 Q. Okay. And how does that fit in with the  
6 timing of when you-all have your Sand Hills-specific  
7 budget meetings?

8 A. Everything kind of falls in together. So  
9 I'm pretty sure that people at the State make sure  
10 that they are communicating with everybody to say,  
11 okay, hey, the budget for the State -- so you're  
12 closing out budget. So that's one thing you have to  
13 be prepared to do. In addition to that, preparing  
14 your budget for the next year.

15 And I can't say that I ever received any  
16 information that was late or held me back because the  
17 State didn't schedule anything. So I think they're  
18 aligned pretty well.

19 Q. Okay. And just to make sure I wrap up what  
20 we have here in connection with the RESA -- I'm  
21 sorry -- in connection with the LEA, are there any  
22 other planning meetings? It sounds like several  
23 things fall into the bucket of planning meetings.

24 A. I'm trying to get my hats together. GaDOE,  
25 for special ed, offers planning meetings as well. And

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1 a lot of those are done virtually, again, as a result  
2 of COVID. But the good things about all the meetings  
3 now is that we can go back and pull the information  
4 and look at those recorded meetings, and then make  
5 sure they send us all the handouts out so that we can  
6 go back and reference it if we need to.

7 Q. And, again, are these meetings that are  
8 targeted at GNETS directors?

9 A. No. These meetings are just statewide  
10 meetings for anybody who receives state or federal  
11 funds.

12 Q. Okay. And you participate in them as a  
13 GNETS director?

14 A. Yes.

15 Q. Okay.

16 A. Could I add something?

17 Q. Mm-hmm (affirmative).

18 A. Now, there are GNET-specific meetings that  
19 we do have regarding completing our consolidated  
20 application because we have a separate application as  
21 well.

22 Q. Okay. And so you do your own consolidated  
23 application for the GNETS program?

24 A. Well, it's along with our strategic plan,  
25 the strategic plan with the State, and then what we do

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1 with our individual programs to support that plan as  
2 well as implement our own program.

3 Q. Okay. We'll circle back to that a little  
4 later, but that's helpful to know --

5 A. Okay.

6 Q. -- that as a program you both completed  
7 consolidated application, and you also do a strategic  
8 plan.

9 A. Mm-hmm (affirmative).

10 Q. And then last question. With regard to the  
11 LEA reporting you had mentioned that there is a state  
12 person by the name of Myesha who participates as a  
13 district liaison?

14 A. Mm-hmm (affirmative).

15 Q. Does she play an active role in those  
16 meetings?

17 A. Oh, absolutely. Everybody reports, staff.  
18 So she gives us updates about what may be going on in  
19 the State that impact students with disabilities, any  
20 type of programming changes that she's aware of. The  
21 State superintendent sends out a weekly email blast.  
22 If there is information in there we need to make sure  
23 we pay attention to, she'll point those things out.  
24 And then she gives us an opportunity to ask questions  
25 or concerns about anything that we might have.

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1 Q. Under this next row for RESA you had  
2 mentioned that there is another meeting. This one is  
3 held by the Board of Control in their monthly meetings  
4 with the superintendents from all of the participating  
5 school systems.

6 A. Mm-hmm (affirmative).

7 Q. What is the Board of Control?

8 A. So it's a collective body. This is  
9 Ms. Newsome's definition. It's a collective body of  
10 decision makers.

11 So you've got superintendents who attend.  
12 You have -- you may or may not have, depending on who  
13 they invite, people from the State, to address any  
14 concerns that the superintendents might have.

15 You have representatives from the local  
16 colleges and universities, they are there. Any type  
17 of agencies that might support the school systems may  
18 be invited.

19 And they're the people who control the  
20 school systems, for lack of a better word, and they  
21 report out, share information, receive updates.

22 Q. Okay. And it sounds like you also provide a  
23 monthly report at these meetings?

24 A. I do.

25 Q. What do those reports entail?



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1           A.     So I would give them information regarding  
2     any issues related to -- or not issues, but I'd give  
3     them information about enrollment, percentage of  
4     students by disabilities who are participating in the  
5     program.

6                     I would give them information about any  
7     updates that might be coming along, information about  
8     technical assistance that might be available.

9                     And also I'd give them a budgeting and  
10    finance. I'd give them information and updates on  
11    where we are with that, what we're spending the  
12    funding on. And then give them opportunity to ask any  
13    questions or concerns.

14           Q.     Okay. And then you mention here planning  
15    meetings. Are there any additional planning meetings  
16    beyond the ones you've already shared involving the  
17    RESA?

18           A.     Not at this time. Professional learning.  
19    We do a lot of planning meetings that are specific to  
20    what type of professional learning they might provide  
21    to our program. So I have been doing some of that  
22    recently.

23           Q.     Are you providing the professional learning,  
24    or receiving it?

25           A.     Both.

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1 Q. Okay.

2 A. But right now we're actually receiving it.  
3 But if they needed assistance, then we would  
4 definitely provide that as well.

5 Q. Okay. And at a high level, what does that  
6 look like when you're providing professional learning  
7 to the RESA?

8 A. So -- well, I-- let me back up. I probably  
9 shouldn't have said to the RESA. It would be to those  
10 participating school systems because that's what they  
11 do. They provide the professional learning to the  
12 school systems who might request that.

13 So some of the requests might be "Do you  
14 have anybody who could do MindSet training?" We have  
15 several MindSet -- certified MindSet trained staff.  
16 It might be training regarding functional behavior  
17 analysis, or development behavior and eventual plan of  
18 classroom management. And we provide that same level  
19 of support to any of those agencies. So it's which  
20 system would need the support is what we would look  
21 at.

22 Q. On this next page is there anything else  
23 under GLRS where you're having regular meetings beyond  
24 the ones we've already discussed?

25 A. No.

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1 Q. Okay. And then under this last row you have  
2 State reporting. You mentioned monthly meetings with  
3 State representatives?

4 A. Mm-hmm (affirmative).

5 Q. Have you discussed this one yet?

6 A. I think we talked about it when we talked  
7 about the meetings with GLRS because that's where our  
8 state representative --

9 Q. So that's all the -- sorry.

10 A. Yes.

11 Q. You can finish your sentence.

12 A. I said yes, that was -- I also -- I also  
13 talked about it already.

14 Q. Okay. So the monthly meetings with state  
15 representatives here is the GLRS meeting?

16 A. That's correct.

17 Q. Okay. And further down you mention the  
18 meetings are scheduled for all special education  
19 administrators, and a second meeting is scheduled for  
20 GNETS administrators. What's the difference between  
21 those meetings?

22 A. Oh, that's what I was talking about, how  
23 sometimes we'd have the State meetings where the State  
24 talks about the different budgets.

25 Q. Mm-hmm (affirmative).

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1           A.     And then in addition to that, our program  
2 specialist from the State does a meeting to talk about  
3 the plan that we do. So there is a system plan, the  
4 consolidated application, and then there is a GNETS  
5 strategic plan that we go into the portal to upload  
6 and update information.

7           Q.     Okay. All right. Are there any other  
8 regular reoccurring meetings that you have with  
9 individuals from the LEA, the RESA or the State?

10          A.     Any time there is any type of a professional  
11 learning, I might not participate in those  
12 specifically, but we do have representatives who  
13 participate.

14                 So with Richmond County LEA I have a GNETS  
15 liaison. She participates in all of the -- last year  
16 it was weekly -- meetings for the program specialists.  
17 And basically that, those meetings look at any types  
18 of updates or changes, concerns, that they might have  
19 regarding policies, procedures or practices within the  
20 school system, she participates in that. And then she  
21 comes back and she shares the information with the  
22 administrative team as well as the staff, when needed.

23                 But she also supports teachers in the  
24 behavioral support classes with that and she makes  
25 sure she has the same information so we're saying the

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1 same thing.

2 And the Thomson site, if there are any types  
3 of meetings regarding like preparing for testing  
4 protocols or things that the school system might  
5 participate in the special education, I mean, excuse  
6 me, the GNETS coordinator, participates in those  
7 meetings. And so we're invited to those and we always  
8 try to participate.

9 Q. Okay. Do you report to anyone directly with  
10 the LEA?

11 A. Yes.

12 Q. Okay. Who would that person or people be?

13 A. So you're talking about like supervising?

14 Q. Yes.

15 A. So my direct supervisor is -- well, was,  
16 Dr. Shontier Barnes. I have a new supervisor,  
17 Mr. Marcus Allen. I think he just started the last,  
18 this last month.

19 Q. And what are their positions?

20 A. So Dr. Barnes was the assistant  
21 superintendent for Area 6. And I can tell you the  
22 areas that he covers, but I can't tell you the  
23 actual -- if he's Area 6 or Area 7. He works with the  
24 special programs and support services like MTSS,  
25 Special Education, GNETS, and our special programs

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1 like GNETS and I want to say Alternative School, but  
2 don't quote me on that one. So that's my new  
3 supervisor.

4 Q. Okay. And does Area 6 cover a certain  
5 number of counties?

6 A. Area 6 is within the school system because  
7 we are aligned with Richmond County, and there is a  
8 reporting structure, and there is accountability  
9 structure. I fall under Richmond County.

10 Q. Okay.

11 A. And so that's my supervisor for the program.

12 Q. And then you said that was Dr. Barnes?

13 A. Mm-hmm (affirmative).

14 Q. For Marcus Allen, what is Marcus Allen's  
15 title?

16 A. Assistant superintendent. But I can't tell  
17 you what area it is. I can just tell you those  
18 programs that he covers.

19 Q. Okay. Did he or she replace Dr. Barnes?

20 A. I'm not sure. I just know that I got an  
21 email -- because Dr. Barnes is still here. They may  
22 have added an additional position. And he's now my  
23 supervisor.

24 Q. Okay. Is there anyone else who you report  
25 to directly for the LEA?

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1 A. If there was a question with the  
2 superintendents, I would report questions out -- I  
3 mean, address concerns with them, as well as the --  
4 not that they're my supervisor, but if there are  
5 questions or concerns, typically my first point of  
6 contact would be the special ed directors in those  
7 school systems.

8 Q. What about for the RESA, is there anyone who  
9 you directly report to?

10 A. Any correspondences that I have, I report  
11 back to Dr. Alexander.

12 Q. And what is Dr. Alexander's position again?

13 A. I'm going to say she's director of RESA.  
14 But don't quote me on that one.

15 Q. Okay. Anyone else?

16 A. No.

17 Q. And would you also say Dr. Alexander is your  
18 main point of contact for the RESA?

19 A. She is, yes. Oh, I'm sorry. I would add  
20 another person. I report to, again, not my  
21 supervisor, but I do report information back to GLRS  
22 as well, and Lisa Hill would be my contact for GLRS.

23 Q. Okay. And what is Lisa Hill's position?

24 A. She is director for the GLRS program.

25 Q. And then what about for the Georgia

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1 Department of Education, is there anyone you report  
2 to?

3 A. It would be Vickie Cleveland and LaKesha  
4 Stevenson.

5 Q. And what are their positions?

6 A. LaKesha -- I mean, Vickie Cleveland is I  
7 think a program specialist for the program, and I'm  
8 not sure of Ms. Stevenson's title.

9 Q. Is there anyone else from the State  
10 Department in the list?

11 A. I guess you would say the director, which  
12 would be Wanda Lowe. If she needed something, we'd  
13 report to her. And then the director for Federal  
14 programs. And if you ask me her name, it just went  
15 away.

16 Q. Okay. Is that Shaun Owen?

17 A. I was going to say I remember Shaun. But  
18 yes, that's correct, Shaun Owen.

19 Q. Okay. And just curious if you're familiar  
20 with any of these other individuals who work with the  
21 State Department of Ed. Did you ever work with  
22 Zelphine Smith-Dixon?

23 A. I did.

24 Q. Okay.

25 A. But I worked with her as special ed



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1 director.

2 Q. Oh, in your capacity as special ed.

3 A. Mm-hmm (affirmative).

4 Q. And did you ever work with Nakiba Rahmig?

5 A. Not directly, no.

6 Q. So then I guess returning back to Vickie  
7 Cleveland and LaKesha Stevenson --

8 A. Mm-hmm (affirmative).

9 Q. -- what do your -- what's the nature of your  
10 communications with them?

11 A. They are our point of contact if we had any  
12 questions or concerns at the State level. They  
13 coordinate meetings to talk about initiatives or  
14 programs, budgeting, changes, policies, procedures and  
15 provide updates regarding the GNETS program  
16 specifically. They also keep us up-to-date about any  
17 changes that's going on in special ed at the State  
18 level.

19 Q. Do you have any regularly scheduled meetings  
20 with them?

21 A. The answer is yes, but some of them have  
22 gotten cancelled. Typically, we'll get a calendar at  
23 the beginning of the year that we'll go ahead and  
24 schedule the monthly meetings. And my understanding  
25 is prior to that they did have regular monthly

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1 meetings with the GNETS directors, and then the GNETS  
2 scheduled meetings as well.

3 Q. What's the difference between the two?

4 A. So I'm not really sure because I hadn't  
5 really participated in the second meeting, but my  
6 understanding is that the GNETS meetings with the  
7 State Department, they schedule those.

8 The meetings with the GNETS directors might  
9 be just kind of like an advisory or support kind of  
10 group where we can talk about issues among ourselves,  
11 kind of brainstorm about how to deal with different  
12 types of issues that might be going on, special  
13 programs that one director might have used and want to  
14 share that; collaborative planning for professional  
15 learning, like I think we just did something on how do  
16 we get our staff scheduled to do LSCI training, there  
17 are only a few people in the State who can do that,  
18 what's the best time to kind of get those things done.

19 Q. So for the first meetings you described,  
20 these monthly meetings, it sounds like those are  
21 facilitated by the State; is that correct?

22 A. It is, yes.

23 Q. Okay. And are those held in person,  
24 virtually?

25 A. I got the unique experience of only

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1 experiencing GNETS during the pandemic, and so all of  
2 my meetings have been, with the exception of one, that  
3 January 27th meeting, was face to face, January 2020  
4 was face to face. Everything after that has been  
5 virtual.

6 Q. Okay. And do you have an active role in  
7 those monthly meetings that are hosted by the State  
8 Department of Ed?

9 A. When you say active role, can you explain  
10 that?

11 Q. Mm-hmm (affirmative). Are you mainly  
12 receiving information, or are you also sharing or  
13 presenting about your program?

14 A. Sharing information -- I mean, excuse me,  
15 receiving information.

16 Q. Okay.

17 A. So we receive the information from the  
18 State. And if we have questions, of course we can  
19 always ask.

20 Q. Okay. And is there anyone else from the  
21 State Department of Education besides Vickie Cleveland  
22 and LaKesha Stevenson who participates in those?

23 A. Oh, absolutely. The majority of the time we  
24 have outside people. And when I say "outside," they  
25 are part of the GaDOE family, but we have them

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1 participating giving us information regarding  
2 curriculum instruction.

3 As a result of COVID, there were a lot of  
4 different areas of support that they were sharing with  
5 us to ensure that our children were accessing  
6 instruction. And so we had a different instructional  
7 providers by content areas.

8 We have had the person who works very  
9 directly with -- very closely with transition, she  
10 participates. So they always have additional people  
11 presenting information to us at those meetings.

12 Q. Okay. And then the second meeting that you  
13 reference, it sounds like these are more like support  
14 sessions among the GNETS directors?

15 A. Mm-hmm (affirmative).

16 Q. Who facilitates or lead those meetings?

17 A. I have only known of one since I have been  
18 the director, and that was one of the GNETS directors  
19 from, was it Coastal -- either the director from  
20 Coastal Academy or Elam Academy helping. It might  
21 have been both of them together, they kind of put some  
22 things together so we could share information about  
23 resources that are available.

24 And so when they presented that one -- and  
25 this one was face to face -- they did have different

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1 program providers who had information regarding  
2 mindfulness, again talking about LSCI, and some of  
3 them had information about instructional software.  
4 And so just gave us an opportunity to kind of talk  
5 about that.

6 Q. When was that particular meeting held?

7 A. First week in June. It was like June 5  
8 through the 7th.

9 Q. Of this year?

10 A. Mm-hmm (affirmative).

11 Q. 2022?

12 A. Yes.

13 Q. And how frequently are they supposed to have  
14 occurred?

15 A. I have no idea. I think they were doing the  
16 meetings monthly prior to COVID, and so COVID really  
17 slowed down a lot of the face to face meetings that  
18 were taking place.

19 Q. And who sets the agenda for those meetings?

20 A. The GNETS directors actually. If you -- if  
21 there is a topic that you want included, we could send  
22 those things in.

23 Q. And how well attended was that meeting that  
24 you attended?

25 A. They were very good about setting it up so

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1 that you could do face to face, and also participate  
2 virtually. And so I want to say at least, give a, my  
3 rough estimate, is about 90 percent of the GNETS  
4 directors either participated, or had somebody  
5 participate on their behalf.

6 Q. And does anyone from the State DOE  
7 participate in those meetings?

8 A. We had somebody at this meeting. They did  
9 come to that meeting. As a matter of fact, it was  
10 Vickie Cleveland was there, LaKesha Stevenson  
11 participated virtually, and Shaun Owen was there.

12 Q. And what role did they play, if any?

13 A. So one of the concerns was we had a lot of  
14 questions about I guess it was some budgeting concerns  
15 that were going on about how the program was going to  
16 be funded. And so they came out to basically provide  
17 support, answer any questions that we had about  
18 funding for the program in the future.

19 THE VIDEOGRAPHER: I hate to interrupt.

20 (Comments off the record.)

21 BY MS. HAMILTON:

22 Q. Sure. Can you repeat what you're saying?

23 A. Can you ask me the question again?

24 Q. Sure. You had mentioned that there were  
25 some -- I think Vickie Cleveland, LaKesha Stevenson

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1 and Shaun Owen present at the June meeting, and I was  
2 asking what was their role at the meeting. And you  
3 said there were some questions.

4 A. So, yes, there were some questions about the  
5 funding for FY '23. And so there was some concerns  
6 with a lot of the programs about how the funding was  
7 supposed to be provided in the future.

8 And so they came to kind of talk to us about  
9 that piece, give us an opportunity to ask any  
10 questions, talk about possible plans. Oh, I'm sorry,  
11 Wina Low was there as well, the State director. She  
12 was there.

13 Q. Mm-hmm (affirmative).

14 A. And give us an opportunity to ask them any  
15 questions that we might have about funding for the  
16 future.

17 Q. What was the nature of the concerns about  
18 funding for fiscal year '23?

19 A. There were some concerns because when the  
20 State budget was announced there was no line item for  
21 the Sand Hills GNETS program. So there was a lot of  
22 concerns that we might not receive any funding, or  
23 what the funding -- not that we wouldn't receive  
24 funding. We wouldn't receive funding in the same way  
25 we had received it previously, and so a lot of the

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1 directors had concerns about what that was supposed to  
2 look like.

3 At the end of the budget hearing, we did  
4 keep the funding but it did lead us to kind of have  
5 concerns about what happens for next year, and what  
6 would the plan be, and what would this look like for  
7 the programs for FY '23 and beyond.

8 Q. Did anyone explain why officially there was  
9 no proposed line item for Sand Hills?

10 A. Well, my understanding is that nobody knew  
11 why there was no line item for that. And that was  
12 another source of concern is that nobody knew that it  
13 had been taken off and how it got added, and what  
14 steps do you take to make sure that doesn't happen  
15 again. We can't control whether or not they're --  
16 that we're included in the budget, but that we are  
17 aware of if they are going to make any major changes  
18 like that. But mostly we were concerned about what  
19 that's going to look like for the children that we  
20 serve, you know, how do we continue to support them,  
21 how do we transition them back.

22 Q. Okay. And when you say no one knew, did any  
23 of the representatives that you named from the State  
24 have any knowledge about that?

25 A. My understanding is that it caught them off



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1 guard as well.

2 Q. And so it sounds like you said you learned  
3 that you would be able to keep the funding for fiscal  
4 year '23. What information or assurances were shared  
5 with you about future funding?

6 A. None. So we don't have -- we still don't  
7 have a clear understanding of what that's supposed to  
8 look like beyond FY '23. Well, I shouldn't say we. I  
9 should say I.

10 Q. And for purposes of fiscal year '23, was  
11 there a significant difference from what funding you  
12 ultimately did receive, or is it similar to prior  
13 years?

14 A. It's very similar. As a matter of fact, we  
15 got additional funding for therapeutic services for FY  
16 '22, '23 and '24 projected on the table.

17 Q. And what is that funding? I know you said  
18 for therapeutic services. What is that specifically  
19 designated for?

20 A. For us to provide additional therapeutic  
21 services. One of the things that was realized is that  
22 when we returned back after the pandemic the students  
23 seemed to have an increased need for therapeutic  
24 supports and services that may not have been readily  
25 available with the funding structure that we had or

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1 the staff that we had, and there was a great need to  
2 increase the capacity for that.

3 And so each GNETS received \$62,500 to  
4 provide additional therapeutic supports and services.  
5 The stipulations with that is for the direct support  
6 of the students. And so as a result, I'm speaking for  
7 the Sand Hills program, we were able to hire a  
8 additional social worker to come in and support the  
9 students. We were able to hire some outside agencies  
10 to come in and do SCL support, provide on-site  
11 in-classroom support for students who might have been  
12 in crisis, as well as it got to -- the teachers got to  
13 see the interventions that they use to -- they model  
14 for the students on how to keep them calm.

15 And then we had another LPC who came in and  
16 provided support, and will continue that support for  
17 FY '23 as well.

18 Q. Okay. So you had these services this past  
19 school year, and will continue this coming school  
20 year?

21 A. Yes. That was the special grant funding for  
22 three years.

23 Q. Okay. All right. I'll ask some more  
24 questions about that later in the deposition.

25 A. Okay. That's fine.

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1 Q. But that's very helpful to know.

2 Are there any other meetings that you have  
3 with other GNETS directors?

4 A. No. Mm-hmm (affirmative).

5 Q. Have you ever participated in the GNETS  
6 Strategic Planning committee?

7 A. I was not a part of that initial planning  
8 committee, but as far as the strategic plan  
9 discussions, I have participated in those. And we do  
10 talk about the strategic plan when we have our monthly  
11 meeting. But the developing of the strategic plan, I  
12 was not a part of that process.

13 Q. Okay.

14 A. It was already in place when I came on  
15 board.

16 Q. And are you familiar -- I don't know if this  
17 may be one of the meetings you've already referenced.  
18 Are you familiar with the meeting named the LEA  
19 Collaborative?

20 A. That's the GLRS meeting.

21 Q. Okay. Those are the GLRS meeting?

22 A. Mm-hmm (affirmative).

23 Q. Okay. And do you have any -- do you report  
24 to anyone from any other state agencies?

25 A. When you say report, you mean like just

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1 share information?

2 Q. Yes. So state agencies, I'm referring to  
3 the Department for Behavioral Health and Developmental  
4 Disabilities or Department for Community Health or  
5 others?

6 A. So the Department of Developmental  
7 Disabilities, they participate in the GLRS meetings,  
8 so we both share information with each other.

9 Georgia Department of Vocational  
10 Rehabilitation Services, they are at the meeting as  
11 well. And I have been working closely with the  
12 representative from Vocational Rehabilitation  
13 Services. They do a program called High School High  
14 Tech, and we were trying to get our kids included in  
15 that, and so we came up with a plan for getting our  
16 students involved.

17 This year there's been a big push at the  
18 State to ensure that we start capturing students in  
19 the 9th grade. And so there is virtual job sharing.  
20 So we've been trying to make sure -- excuse me --  
21 virtual job shadowing. We're trying to make sure our  
22 students get to be a part of that.

23 Q. Okay. Who is your primary point of contact  
24 at DBHDD?

25 A. I don't have a primary point of contact.

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1 Q. Okay.

2 A. It would be whoever the -- if I needed to  
3 reach out, there is a person, and I can't think of --  
4 I don't know her name, that participates in our GLRS  
5 meetings, and that would be the person I reach out to.

6 Q. Okay.

7 A. And they send a flier out to give us the  
8 contact information.

9 Q. Do you know her position?

10 A. I don't.

11 Q. Okay. And then who is your point of contact  
12 at the Georgia Vocational Rehab?

13 A. I'm going to tell you right now I'm probably  
14 not going to remember any last names. Her name is  
15 Brittany is her first name.

16 Q. And do you know her position?

17 A. She just got a promotion, so I'm not  
18 familiar with what her position is, but she's still  
19 serving as the contact person. I'm going to say her  
20 last name is Nelson. Put a question mark behind that.

21 Q. Okay. And do you have any point of contact  
22 with DCH?

23 A. No.

24 Q. Okay. All right. So switching gears I want  
25 to talk to you a bit about just the Sand Hills program

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1 as a whole.

2 A. Okay.

3 Q. There are two separate GNETS Centers for  
4 this Sand Hills program; correct?

5 A. Mm-hmm (affirmative).

6 Q. What are the names and locations of those  
7 facilities?

8 A. So we have the Richmond County site, and  
9 it's located at 1740 Walton Way in Augusta, Georgia.  
10 And then we have the Thomson site that's located at  
11 511 South Main Street in Thomson, Georgia.

12 Q. Okay. What counties are served by the Sand  
13 Hills program?

14 A. So we have seven participating school  
15 systems. We've got Glascock, Lincoln, McDuffie,  
16 Richmond, Taliaferro, Warren and Wilkes. And there  
17 has been, depending on where students may be located  
18 in Jefferson County or Burke, we might have them  
19 participating as well. But I don't have any right  
20 now.

21 Q. Okay. And do certain facilities serve  
22 specific counties?

23 A. Yes. The Richmond County site serves the  
24 students in the Richmond County School System, and the  
25 Thomson site serves all the other counties.

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1 Q. Okay.

2 A. That's considered our satellite center.

3 Q. And I know you mentioned that there have  
4 been times when your program has served students from  
5 Jefferson County and Burke County. Have you also  
6 served students from Columbia County?

7 A. Oh, gosh, that was years ago. Yes. That  
8 was years ago.

9 Q. Okay. For the counties that are not  
10 currently participating, why are they not  
11 participating? Do they just not have any students?

12 A. I can't answer that specifically because I  
13 wasn't a part of that when they decided not to  
14 participate at that time is I all I can tell you about  
15 that.

16 Q. Okay.

17 A. And that would be Columbia County is the  
18 only one I'm aware of.

19 Q. Okay. And so you don't know how, for  
20 example, how if Columbia -- how they are currently  
21 serving students who might have needs?

22 A. I can speculate, but do I absolutely know?  
23 I don't.

24 Q. Okay. Have any of the -- so for the two  
25 sites that you currently have for Sand Hills, have any

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1 of them changed physical locations since 2015?

2 A. Both of them have. Thomson -- and I don't  
3 know the address for the old center. I just remember  
4 it was on the same street. They moved from the one  
5 building to another after '20- -- I think for FY '16,  
6 but -- I'm not sure if that's the exact year, but they  
7 did change locations.

8 In Richmond County there was a lot of  
9 construction going on with schools, so a lot of the  
10 schools that were not decentralized were all  
11 centralized to the Tubman site.

12 Q. And do you know why the Thomson site moved  
13 locations?

14 A. My understanding is that there was some  
15 concerns regarding the facility that they were in.

16 Q. And were those concerns brought to the  
17 attention of the program by the State Department  
18 event?

19 A. I can't answer that question. I'm sorry.

20 Q. Okay. Then and that predates your time?

21 A. It does, mm-hmm (affirmative).

22 Q. Do you know any more about the nature of the  
23 concerns about the facility?

24 A. I don't.

25 Q. Since you've been director have there been



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1 any concerns about the physical condition of the  
2 facilities?

3 A. Any concerns that are presented to the --  
4 are you talking about specifically Thomson or Richmond  
5 or both?

6 Q. Both, that you've been in communication with  
7 the State Department of Education about?

8 A. Oh, no, not with the State Department. Any  
9 concerns I have, I always try to follow the chain of  
10 command and share that information with them. And  
11 typically they respond pretty fast to concerns that we  
12 present to them.

13 Q. Okay. And what's been the nature of the  
14 concerns that you've raised following your chain of  
15 command?

16 A. It might be something like -- well, one of  
17 the biggest things is -- well, just basic facilities  
18 things. Making sure that if we have an issue with  
19 something that's like maybe the tile's got stains in  
20 it, which might, you know, mean there is a leak  
21 somewhere, turning things in like that. If there are  
22 concerns about -- I think there was a scheduling  
23 concern about the custodial staff during COVID, making  
24 sure that we had custodial staff on site. Just  
25 basically routine facilities maintenance and

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1 management. If it looked like we needed to get the  
2 lawn cut, or -- both sites are right in the middle of  
3 community areas and they're open campuses, so you have  
4 a lot of people coming in throwing trash everywhere,  
5 and especially after long weekends or holidays, making  
6 sure that somebody comes out and, you know, kind of  
7 checks that.

8 Q. And I know you said you haven't brought any  
9 concerns to the State Department of Education during  
10 your time.

11 A. Mm-hmm (affirmative).

12 Q. Has the State conducted any inspections, or  
13 raised any issues with you?

14 A. Well, you know, I go back, I had the unique  
15 experience of coming on board during COVID. So we  
16 really were not receiving any on-site visits during  
17 that time.

18 Q. You mentioned that both of the sites share  
19 their facilities with other programs; correct?

20 A. That's correct.

21 Q. Who does the Richmond site share their  
22 facility with?

23 A. So we're primarily on the first floor. We  
24 do have a couple of classrooms on the second floor,  
25 but we also share with the Performance Learning Center

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1 as well as Department of Justice. There is some  
2 community programs, Department of Justice does some  
3 community programs are on the third floor.

4 We've got our social workers, Homeless  
5 liaison, I think they are there as well.

6 Q. And remind me do any of those programs serve  
7 students on site?

8 A. Performance Learning Center does during the  
9 instructional day, and Department of Justice does as  
10 well.

11 Q. Okay. Do the students in the GNETS program  
12 at the Richmond site have any shared classes or  
13 activities with the students from either of those  
14 programs?

15 A. No. But we do have some students who  
16 participate in programs through Department of Justice  
17 because of some outside things they may have gotten  
18 involved in.

19 Q. Can you speak a bit more about what that  
20 dynamic looks like?

21 A. It actually works pretty well. We've got  
22 Department of Justice on the third floor.

23 And so some of our students may have gotten  
24 into some issues through the community where they had  
25 been referred through some criminal activity, or maybe

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1 needing some additional support that the parents may  
2 have requested through the Department of Justice -- I  
3 mean, excuse me -- Department of Juvenile Justice.  
4 And they may leave our program at the end of the day  
5 at 2:30 and participate in a program for the  
6 Department of Justice, DJJ, and they'll go up there to  
7 do whatever activities, whether it's counseling,  
8 whether it's classes that they take, they'll  
9 transition to there. And then they transport them  
10 home probably between 5:30 and 6:00.

11 But they also come down and check in on the  
12 students as well to see how they are doing, touch base  
13 with us to find out if we have any concerns.

14 Q. Okay. So beyond the students who are  
15 already involved with DJJ, or Department of Justice,  
16 would students in GNETS have any other interaction  
17 with the DJJ program?

18 A. No.

19 Q. Okay. And then for the Thomson site, what  
20 other programs share that facility?

21 A. They have the, let's see, Achievement  
22 Center, McDuffie County Achievement Center. It's an  
23 alternative educational program.

24 I'm not totally positive that this is how  
25 it's set up, but they have students who might be there

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1 for disciplinary reasons, as well as the possibility  
2 there that may be some students there who participate  
3 for other reasons as well. And then they have a Prime  
4 Time that's their after-school. I think that's  
5 through the YMCA.

6 Q. Okay.

7 A. And Student Services is located there as  
8 well. But Student Services doesn't have students on  
9 site all the time.

10 Q. And, again, what is the relationship between  
11 the GNETS program and the Alternative Center? Is  
12 there any overlap in classes or services?

13 A. Not classes and services, and this is for  
14 both sites. For FY '23 we will start going into the  
15 cafeteria. So there may be some overlap where we're  
16 using the facilities like those community-type areas,  
17 well, then they have some overlap.

18 Q. So the students at both facilities --  
19 actually, let me make sure I understand.

20 So at Thomson, the GNETS students at Thomson  
21 may share -- may have lunch the same time as students  
22 from the Alternative Center?

23 A. Correct. And the same thing for the  
24 Richmond center, the students at Performance Learning  
25 Center.

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1 Q. And what about, so at Richmond would they  
2 have students who were also being served by the DJJ --

3 A. No.

4 Q. -- or Department of Justice?

5 A. Huh-uh. No, they don't use the facilities  
6 for the cafeteria.

7 Q. Okay. From a scheduling standpoint do you  
8 already know which students will be attending your  
9 programs next school year?

10 A. Yes.

11 Q. Okay. And are those schedules already in  
12 place?

13 A. They will be by the end of this week. Our  
14 11-month staff have been out, so we'll work on  
15 schedules this week.

16 Q. Okay.

17 A. They just got back today.

18 Q. Okay. Who creates those schedules?

19 A. The coordinators, along with the admin team  
20 and myself, we look at the schedules. We look at when  
21 the students need to go to PE -- when they need to go  
22 to lunch, when they need to go to the Media Center.  
23 We look at all those things and kind of fill those  
24 things in for them.

25 And then when the teachers come back, of

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1 course, they can kind of finalize whatever we've  
2 tentatively planned.

3 MS. HAMILTON: All right. I'm going to hand  
4 the court reporter what I would like to have  
5 marked as Exhibit 195.

6 THE VIDEOGRAPHER: And, Andrea, I'm getting  
7 some rustling. Is your mic behind --

8 (Comments off the record.)

9 (Plaintiff's Exhibit P-195 marked.)

10 BY MS. HAMILTON:

11 Q. All right. And I apologize for the small  
12 print here. So I have just handed you what is marked  
13 as Plaintiff's Exhibit 195. This is a Student  
14 Enrollment Spreadsheet for the Thomson program that  
15 was produced by the Sand Hills program in response to  
16 the United States subpoena to produce documents dated  
17 August 20, 2021.

18 So for clarification, what you'll see  
19 here -- okay. So this document, when it was given to  
20 us, had a unique identifier of 000023, and this is for  
21 the '21-'22 school year.

22 What you'll notice, though, is that the  
23 first four columns of the spreadsheet have been  
24 redacted. It had student first name, last name, ID,  
25 and date of birth, and we redacted that to protect the

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1 confidentiality of the students. So the next column  
2 is where it starts with the student grade.

3 And this was part of a larger set of  
4 documents that we had received that had I think the  
5 '19-'20 school year, '20-'21 school year and '21-'22,  
6 so this is just '21-'22.

7 A. Okay.

8 Q. Are you familiar with this document?

9 A. I am.

10 Q. Okay. Great. And am I correct that this is  
11 a spreadsheet reflecting the Thomson student  
12 enrollment for the '21-'22 school year?

13 A. Yes.

14 Q. Okay. You provided this to us in response  
15 to the subpoena?

16 A. That's correct.

17 Q. Okay. And did you play a role in making  
18 this document?

19 A. I'm pretty sure I created the document.

20 Q. Great. Okay. So I just want to walk  
21 through the spreadsheet to make sure we understand  
22 some of the information that's conveyed here. And we  
23 do recognize that the information we received was at  
24 the point in time when you-all produced it, but the  
25 numbers fluctuate throughout the school year.



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1 A. Okay.

2 Q. Based on this document, though it appears  
3 that there were approximately 30 students enrolled at  
4 the Thomson site --

5 A. Mm-hmm (affirmative).

6 Q. -- this past school year, is that accurate?

7 A. At the time of the document it probably is  
8 very accurate.

9 Q. Okay. Would you say an enrollment of 30  
10 students at the Thomson site is comparable to past  
11 school years' enrollment?

12 A. Comparable to the last two-and-a-half years,  
13 yes.

14 Q. Okay. Prior to that -- well, when you say  
15 for the last two-and-a-half years, is that just based  
16 on your knowledge of?

17 A. Correct.

18 Q. Okay.

19 A. Mm-hmm (affirmative).

20 Q. Do you anticipate that the enrollment  
21 numbers will change significantly for next school  
22 year?

23 A. The enrollment numbers might not change a  
24 whole lot, but the students who are participating  
25 probably will because we'll be transitioning students

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1 in and out. Typically we range between about 30 to 35  
2 students in the Thomson site, but the students change  
3 throughout the year.

4 Q. Okay. So looking at this first column that  
5 says Grade it appears that at the Thomson site you-all  
6 served grades 2 through 12 last year; is that correct?

7 A. Based on this time, yes. I think before we  
8 got to the end of the school year we may have had a  
9 first grader.

10 Q. And please feel free if there are additional  
11 updates --

12 A. Okay.

13 Q. -- like you just added to share that  
14 information as well.

15 A. All right.

16 Q. Is that common for you-all to have  
17 first-graders served by your program?

18 A. Yes, depending on -- we don't have a lot of  
19 young children there, but depending on the severity  
20 and the need of the student, we might get a referral  
21 for a first grader; especially if they have already  
22 been involved with, like, a Babies Can't Wait, or had  
23 a preschool placement.

24 Q. What's the youngest grade that you-all  
25 serve?

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1 A. The youngest child we can serve is age five.

2 Q. Moving to the Primary Disability column, is  
3 it correct that the majority of the students that are  
4 at the Thomson site had a primary diagnosis of autism?

5 A. There appears to be a high number of  
6 students with autism, yes.

7 Q. And is that consistent with your just  
8 general recollection of the program?

9 A. Yes.

10 Q. Is there any particular reason for that?

11 A. I can't identify a particular reason. I can  
12 only identify that if they are referred to us for  
13 consideration and they meet the criteria, then they  
14 would be eligible.

15 And the disability in and of itself wouldn't  
16 necessarily say, okay, he has autism, we're not going  
17 to take them. But if they are having severe  
18 emotionality and they met the criteria, then we would  
19 accept them into the program.

20 Q. And between the Thomson site and the  
21 Richmond site, is there any specialization of focus or  
22 services at one over the other where you would have  
23 more students with a particular disability served?

24 A. No. It would be based on emotionality,  
25 severe emotionality and need.

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1 Q. Okay. All right. Moving to if you go over  
2 a few columns to School System.

3 A. Mm-hmm (affirmative).

4 Q. Is it correct that the majority of the  
5 students at the Thomson site come from McDuffie  
6 County?

7 A. That is correct. It's a larger school  
8 system.

9 Q. Okay. And then would you say that the rest  
10 of the students come from a mix of the other counties  
11 served by Thomson?

12 A. Yes.

13 Q. Can counties reserve spaces from year to  
14 year for possible referrals from their respective  
15 schools in the future?

16 A. Absolutely not.

17 Q. Have they ever tried to?

18 A. No.

19 Q. Okay.

20 A. Not during the years I have been there.

21 Q. Okay. All right. And so the column right  
22 before that one that says Case Manager. What is the  
23 role of case manager?

24 A. That would be the special education teacher  
25 and/or the service provider, but primarily making sure

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1 -- that's a person that we would contact if the --  
2 when we need to get information regarding IEP data  
3 that's collected, that person would be responsible for  
4 that.

5 Q. Okay.

6 A. And a lot of times it's one and the same  
7 person.

8 Q. Okay. So when students are assigned to  
9 either of your sites, is it based purely on their  
10 residence, or are there other determinations for how  
11 they end up at one site versus the other?

12 A. Yes, based on residence. So students for  
13 Richmond County are typically Richmond County  
14 students, and then those participating students in the  
15 Satellite Center would be from those participating  
16 school systems that I mentioned earlier.

17 Q. Okay. Is transportation provided for  
18 students attending school at both locations?

19 A. Yes.

20 Q. Who covers the expenses for that?

21 A. The school system, the participating school  
22 system.

23 Q. So for the Thomson site, how far do students  
24 typically travel to attend school?

25 A. I'm not sure about the distance, but the

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1 typical ride would be 45 minutes or less.

2 Q. And for students who ride the bus, is their  
3 bus route directly from home to the program, or is  
4 there -- like I think when we did our site visit we  
5 learned about there being a bus barn.

6 A. And it is different for each school system.

7 Q. Okay.

8 A. So some systems may transport them directly  
9 home. Some systems may take them to a center location  
10 and they are transported from there to their homes.

11 Q. So the center location would be the  
12 equivalent of the bus barn?

13 A. The bus barn, yes.

14 Q. Okay.

15 A. Were you asking about both programs, or just  
16 Thomson?

17 Q. Just Thomson for that one.

18 A. All right.

19 Q. For Thomson what is the longest bus route?

20 A. I'm going to say about 45 minutes.

21 Q. Mm-hmm (affirmative).

22 A. I don't know the distance.

23 Q. Do you know if any students have a route  
24 that would last longer than an hour?

25 A. I don't. And if we knew of any, we would

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1 probably have already addressed it.

2 Q. So that's not your general expectation?

3 A. No, huh-uh (negative).

4 Q. What are the start and end times based on  
5 the bell schedule at Thomson?

6 A. They take in at 8:00, and they start  
7 dismissing kids -- dismissal is between 2:00 and 2:15.

8 Q. During our site visit we were told that  
9 students leaving Thomson have to leave early each day  
10 like around 1:30 or 1:45 to be able to make their  
11 transfer. Can you speak to that?

12 A. There was one school system, and that was --  
13 I think it's Wilkes County. Everybody else is leaving  
14 between 2:00 and 2:15, they're loading on the busses.  
15 And we did reach out to that director, that's  
16 something they started this year, not really sure why  
17 the change was made, you know, other than there is a  
18 lot of people not working, and transportation is not  
19 one of those areas that people are flocking to apply  
20 for, so they may have had, you know, shortages with  
21 drivers or whatever. But that's Ms. Newsome trying to  
22 speculate. But that was something that started this  
23 year.

24 We did reach out to the director to find out  
25 if that was something that was going to be implemented

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1 for next year as well. And that was not even the  
2 whole year. It was towards the end of the school year  
3 that they asked for that change.

4 Q. And at this point do you know what the plan  
5 is for Wilkes and whether they are still planning to  
6 have students leave school early to go home?

7 A. I'll know by the end of this week. That's  
8 going to be part of that scheduling when I meet with  
9 the coordinator.

10 Q. What are your views on whether students  
11 should be being dismissed -- I think in this case  
12 it's --

13 A. I think all students deserve to be in --  
14 have the same instructional day as any other student,  
15 so. But again, trying to make sure we meet the needs  
16 of the school system. But we did stress it would be  
17 best if they stayed the full day.

18 Q. And what about drop-off times in the  
19 morning? Are there any significant variances in when,  
20 like, busses are arriving, like do you have  
21 programs -- sorry. Do you have any busses arriving  
22 significantly later than your start time?

23 A. Huh-uh (negative). They usually get in  
24 between 7:50, 8:15. And during that time that's when  
25 the students are eating their breakfast, and so we're



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1 ready to begin instruction around 8:30.

2 Q. Do you know how the start and end times for  
3 the school day for Thomson and Richmond compare to the  
4 rest of the school district?

5 A. Well, when I look at the calendars, I think  
6 they're very comparable to the instruction day for all  
7 the students.

8 Q. Okay. So the students in GNETS, bus issues  
9 aside, generally have the same length school day as  
10 students in the regular general education schools?

11 A. Typically, unless there is a specific  
12 situation where a student might need to transition in  
13 with something else or transition out with something  
14 else. But for the most part we follow the same  
15 instructional period for the students.

16 MS. HAMILTON: Okay. I'm going to hand the  
17 court reporter what I would like to have marked  
18 as Plaintiff's Exhibit 196.

19 (Plaintiff's Exhibit P-196 marked.)

20 BY MS. HAMILTON:

21 Q. Handing you what's been marked as  
22 Plaintiff's Exhibit 196. It looks very similar to the  
23 other one that I just gave you, but this is a Student  
24 Enrollment Spreadsheet for the Richmond program for  
25 the '21-'22 school year that your program produced in

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1 response to our subpoena.

2 A. Mm-hmm (affirmative).

3 Q. Similar to the other document, you'll see  
4 that we also redacted the first four columns that  
5 contain student first name, last name, ID, and date of  
6 birth to protect their confidentiality.

7 A. Mm-hmm (affirmative).

8 Q. Do you recognize this document?

9 A. I do.

10 Q. Okay. And am I correct that this is a  
11 spreadsheet that reflects the Richmond student  
12 enrollment for the '21-'22 school year?

13 A. Yes.

14 Q. And then I'll also just note for the record  
15 that when you-all provided it, it did have a stamp at  
16 the bottom that was -- I think the first page was  
17 000018. And it was also part of a larger spreadsheet  
18 that contained information for multiple school years.

19 A. Okay.

20 Q. All right. So last school year at Richmond  
21 would you agree that there were also approximately 30  
22 students in the program?

23 A. Yes.

24 Q. Okay. And would you say that the number of  
25 students in the Richmond program, that that number has

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1 been pretty consistent across years, or has it  
2 changed?

3 A. Speaking from previous years prior to me  
4 coming on board, it's a little bit lower --

5 Q. Okay.

6 A. -- than it's been over the past  
7 two-and-a-half years.

8 Q. What accounts for that change?

9 A. It could -- this is Ms. Newsome speculating,  
10 could be the result of the pandemic. But it could  
11 also be a result of in Richmond County we started some  
12 -- they started some behavioral support classes. So  
13 one of the things that we wanted to do was really look  
14 at are the students getting the services and support  
15 before they get to us. And so part of the role of the  
16 GNETS liaison is to kind of work with those behavior  
17 support classes, look at students who's been -- who  
18 have been referred to the behavior support class.  
19 That's kind of another area to work on some of those  
20 behavioral supports and therapeutic services that they  
21 need.

22 If the students aren't demonstrating  
23 progress in the behavioral support classes and might  
24 require additional interventions, they may be referred  
25 to us for consideration services.

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1 Q. I know you mentioned the GNETS liaison  
2 earlier. In terms of where they fall in the  
3 hierarchy, are they an employee of the GNETS program,  
4 or are they more of a direct employee of the school  
5 district?

6 A. Both.

7 Q. Okay.

8 A. The person reports to -- works under the  
9 Sand Hills program, but she provides supports to the  
10 Thomson site, the Richmond site, as well as those  
11 behavioral support classes in Richmond County. And  
12 Richmond County funds that position, DOE funds that  
13 position.

14 Q. And these behavior support classes, how do  
15 students end up being placed in them?

16 A. There is a criteria that they have to  
17 follow. The IEP team meets to see what types of  
18 interventions were provided prior to the  
19 recommendation for or consideration for the behavior  
20 support classes.

21 It's very similar to the referral process  
22 for the GNETS Sand Hills program; not identical, but  
23 they've got a lot of the similarities.

24 Q. Okay. I will probe that more a little  
25 later, but that's helpful to know.

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1 A. Okay.

2 Q. Do you anticipate the enrollment numbers for  
3 the Richmond County program changing significantly  
4 next school year?

5 A. I think that there is a possibility that  
6 they may change only because I haven't been able to  
7 identify why there's a decrease. Again, the pandemic  
8 slowed down a lot. We had kids at home. We had sites  
9 that were opening and closing. So for some of our  
10 staff, it may have been difficult for them to collect  
11 the data that they need, or provide the interventions  
12 consistently over time to say that they would be in  
13 need of consideration for services through GNETS.

14 But since it appears that COVID has taken a  
15 plateau, and the schools have been able to stay open  
16 longer I think it will have an increase, if that is  
17 indeed the reason why we don't.

18 Q. Sorry. Do you think next school year you'll  
19 have an increase?

20 A. I think we will, yes.

21 Q. Because you have been having a decrease --

22 A. Right.

23 Q. -- for those other reasons.

24 When will you get your final enrollment  
25 numbers or rosters?

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1 A. We have them now. So unless there is a  
2 referral that's pending, these are the students who  
3 will be participating for next year. Does that answer  
4 your question?

5 Q. So I know this chart is for the '21-'22  
6 school year.

7 A. Mm-hmm (affirmative).

8 Q. And so I guess I'm just trying to get a  
9 rough estimate of how many students you think you'll  
10 have.

11 A. We're slated to have about between 60 and 62  
12 students for next year.

13 Q. For the whole program?

14 A. For the whole program, Thomson and Richmond.

15 Q. Okay. And do you know how that breaks out  
16 by site?

17 A. Oh, I don't want to give you -- there might  
18 be 32 students in Thomson and 26 in Richmond, or 28  
19 and 32, something like that.

20 Q. All right. So looking at this gray  
21 column -- sorry, I want to make sure I have the right  
22 information.

23 So looking at this gray column for Richmond  
24 it looks like last school year you-all served grades 4  
25 through 12; is that accurate?

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1 A. That's correct.

2 Q. Okay. And then do you have a sense of what  
3 grades you'll be serving next school year?

4 A. We're going to start out with fifth grade  
5 because a young man was promoted to the fifth grade.  
6 So we'll start out with 5 through 12.

7 Q. Okay. Have you ever served younger grades  
8 at the Richmond site?

9 A. Not since I have been the dir- -- oh, at the  
10 Richmond site I think we might have had third-graders  
11 when I came on board, and then they got promoted to  
12 the fourth grade.

13 Q. And then moving to the Primary Disability  
14 column it appears that the majority of students at the  
15 Richmond site had a primary diagnosis of EBD?

16 A. Mm-hmm (affirmative).

17 Q. Is that consistent with your understanding?

18 A. Yes.

19 Q. Okay. All right. Moving to the School  
20 System column, this is consistent with what you shared  
21 earlier, but it appears that all of the students who  
22 attended the Richmond site lived in Richmond County  
23 last school year?

24 A. That's correct.

25 Q. Okay. And then turning to Transportation,

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1 what is the typical length of the bus route for  
2 students in Richmond County?

3 A. They are not -- Richmond is pretty large, so  
4 we have busses that are divided. So anywhere between  
5 30 and 45 minutes in Richmond. We don't have anybody  
6 that's on the -- we shouldn't have anybody who's on  
7 the bus more than an hour, going or coming.

8 Q. Is there a bus barn or central location  
9 where students transfer in Richmond County?

10 A. No. They are picked up and dropped off at  
11 the school.

12 Q. And for Richmond County do you have any  
13 issues with students having to catch the bus before  
14 the end of the school day?

15 A. Not -- not issues with anything, no.

16 Q. Okay. Do you have any students who -- whose  
17 busses arrive before the regular school day ends?

18 A. They can arrive as early as they want.  
19 Unless there is a plan in place, they will not board  
20 the bus until we dismiss the students.

21 Q. Okay.

22 A. And we have had some that will sit out there  
23 and wait, and when it's time for them to be dismissed,  
24 then we will dismiss them to board the bus.

25 Q. Okay. And that's for Richmond, the Richmond



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1 site?

2 A. That's for both sites. Mm-hmm.

3 Q. Okay. Sorry. I guess just to clarify, for  
4 Richmond, do you have any issues where school  
5 districts have to pick up students before the end of  
6 the school day early?

7 A. Huh-uh (negative).

8 Q. Okay. And I guess just so the court  
9 reporter can hear you, too?

10 A. No, I don't. I'm sorry.

11 Q. Okay. So returning back to Exhibit 195.

12 A. Mm-hmm (affirmative).

13 Q. For Thomson, I want to continue to work  
14 through this spreadsheet, and about midway through the  
15 page there is a column that says Total Time Spent in  
16 GNETS. Do you see that?

17 A. Yes.

18 Q. Okay. If you want -- you can take a look at  
19 this, and I know you're familiar with it. But your  
20 program reported that the length of time that students  
21 spent in GNETS ranged anywhere from one month to  
22 12 years; is that correct?

23 A. Now, I don't see that on this one. What I  
24 see total time in GNETS, it's actually -- Okay. I see  
25 what you're saying. Yes. I don't see the kids'

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1 names. Yes.

2 Q. All right. And the names wouldn't be there,  
3 but some other identifying like the grade, race, like  
4 you would probably be able to identify the students  
5 without us putting --

6 A. Mm-hmm (affirmative).

7 Q. -- too much information on here. Is it  
8 correct that you had a student in the Thomson site who  
9 had been at GNETS for 12 years?

10 A. I'm going to say I need to clarify that  
11 because I'm looking at this, and this doesn't look  
12 like information that is correct. So how do I go back  
13 to check that these -- I don't want to confirm this,  
14 because I look on here, see a child being 12 years and  
15 I know that can't be accurate because -- I would have  
16 to go back and clarify, ma'am. I'm sorry.

17 Q. So like if you were to look at the row for  
18 that particular student, and I don't want you to  
19 identify the student on the record, but based on the  
20 information here are you able to identify who that  
21 student is?

22 A. Which one are you referring to? I'm sorry.

23 Q. If you scroll down, it's probably easier to  
24 find it starting from the bottom and working up. And  
25 it says: Total time spent in GNETS 12 years?

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1 A. I see that.

2 Q. Okay. And then if you kind of work, kind of  
3 looking at the rest of the row.

4 A. I see that.

5 Q. And it has like the student's grade.

6 A. Mm-hmm (affirmative).

7 Q. Their race.

8 A. I can identify who I think that student is,  
9 but, again, I'd have to go back and verify the number  
10 of years. I'd have to go back and verify the number  
11 of years.

12 Q. Mm-hmm (affirmative).

13 A. I'm not comfortable saying that this is  
14 accurate, ma'am, even though this is what I submitted,  
15 I'm really not comfortable saying that.

16 Q. Okay. When you created this spreadsheet, do  
17 you recall how you gathered the information?

18 A. So I had the coordinators for each site  
19 gather the information, and they turned it in and  
20 that's how it was submitted. So I'm not sure why it's  
21 submitted with the years like this.

22 Q. Okay. So and then I also -- I don't know if  
23 you see this, there is a column that says Date of  
24 Enrollment. So like if you look at that same student,  
25 it says they were enrolled in 2009?

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1 A. Mm-hmm (affirmative). I do see that.

2 Q. And if you look at the spreadsheet, again,  
3 just based on what's here, I understand that you don't  
4 recall specifically that there is also some students  
5 who were listed on the spreadsheet as having been in  
6 GNETS for 11 years?

7 A. On the same one for Thomson?

8 Q. Same spreadsheet for Thomson.

9 A. Mm-hmm (affirmative).

10 Q. And one of those students, it says they  
11 enrolled in 2010?

12 A. Mm-hmm (affirmative).

13 Q. And it's another one further down, it says  
14 they enrolled also in 2010?

15 A. Mm-hmm (affirmative).

16 Q. Okay. And then do you see on the  
17 spreadsheet that it lists that there are students who  
18 have been in the GNETS program for nine years?

19 A. I do.

20 Q. So like this very first student listed, it  
21 says they enrolled in 2012.

22 A. Mm-hmm (affirmative).

23 Q. And then if you scroll down a little  
24 further, there is another student who says they  
25 enrolled in 2012?

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1 A. I see that.

2 Q. Okay. Do you have any reason to believe  
3 that the dates of enrollment listed here are  
4 incorrect?

5 A. I don't. But I still would rather go back  
6 and personally verify all of it.

7 Q. So if, in fact, any of these students had  
8 been in GNETS for 12 years, or 11 years, nine years,  
9 or even seven years, that would have meant they'd been  
10 in GNETS for more than half of their school careers;  
11 correct?

12 A. Yes, that's the way it looks.

13 Q. Were you aware that any students -- and,  
14 again, I understand you're saying you want to go back  
15 and verify -- are you aware that any students had been  
16 in GNETS for that length of time?

17 A. I'm pretty sure from my appearance you can  
18 see that I'm not. I was not aware that they had been  
19 in there that long based on the information provided.

20 Q. And do you recall reviewing this particular  
21 column when you submitted this spreadsheet?

22 A. I was reviewing so many documents, I don't.  
23 And I think that would have stood out to me.

24 Q. Okay. Would it concern you -- again, you  
25 know, someone else completed this on your staff, but

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1 knowing this now would that concern you, knowing that  
2 you've had students who have been in GNETS for that  
3 length of time?

4 A. I would say that if there -- a place --  
5 well, not if. It does stand out. However, I do know  
6 that the way that we operate is we look at the needs  
7 of the students from year to year. In addition to, we  
8 look at how the students are making progress almost  
9 daily. And the IEP team at some point would have made  
10 a determination that the children's least restrictive  
11 environment is appropriate. But it is something that  
12 stands out, yeah.

13 Q. Do you review data points or metrics such as  
14 length of stay on a regular basis for all of your  
15 students?

16 A. We started looking at that my first year  
17 here, but, again, we got cut off because of the  
18 pandemic. I do know that's one of the areas that  
19 we're looking at for FY '23, how long have the  
20 students been in our program as part of that  
21 consideration, specific questions that the team will  
22 be asking regarding transitioning students back for FY  
23 '23; a little bit more than what we've done in the  
24 past, trying to figure out where they need to be.

25 Q. Okay. And do you have any communication

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1 with the State Department of Education about any  
2 questions or concerns or issues related to length of  
3 stay of students?

4 A. Not specifically, no.

5 Q. For both of your sites do you keep  
6 attendance records of which students attend each day?

7 A. We do.

8 Q. For a student to be in attendance, what  
9 proportion of the day do they have to be present?

10 A. So they could attend it -- well, it -- ask  
11 me the question again, please.

12 Q. For a student to be marked as in attendance  
13 for the day --

14 A. Mm-hmm (affirmative).

15 Q. -- what proportion of the day do they have  
16 to be present?

17 A. So we take attendance at the beginning of  
18 the day, and if they are here at the beginning of the  
19 day then we would mark them as being present. If they  
20 left early for any reason regarding because they had a  
21 doctor's appointment, or if their parent needed to  
22 pick them up for whatever reason, then they would be  
23 marked absent for those courses that they missed.

24 Q. Who collects that data for your program?

25 A. In Thomson, the teachers do that. They keep

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1 a manual grade book, and they enter it into the  
2 electronic grade book. And then for Richmond, they  
3 enter it into Infinite Campus.

4 REPORTER: I'm sorry, ma'am. They "enter it  
5 into" a what?

6 A. For the Thomson site the teachers keep a  
7 hard copy, but they manually write down the  
8 attendance. And then they share that information with  
9 the school system so that school systems can enter  
10 that information. And then for the Thomson -- for the  
11 Richmond site, the teachers enter it directly into the  
12 student information system, which is Infinite Campus.

13 REPORTER: Thank you.

14 (Comments off the record.)

15 BY MS. HAMILTON:

16 Q. What is your average daily attendance at  
17 both of your sites?

18 A. Thomson is probably all 30 students, and  
19 Richmond ranges between 26 to 30 students.

20 Q. And during our site visit we had, I think,  
21 taken note that there were approximately 20 students  
22 present at the Richmond location and 22 present at the  
23 Thomson location.

24 A. Mm-hmm (affirmative).

25 Q. Would you say that that's consistent with



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1 your average attendance, or would there have been  
2 something unique about those particular days we were  
3 there?

4 A. Absolutely something unique. We had --  
5 COVID had started increasing. So we had staff and  
6 students who were out as a result of COVID as well as  
7 there was some type of virus going on specifically for  
8 the Thomson site.

9 For the Richmond site, we didn't have COVID  
10 issues, but there was a virus going on. I think there  
11 was -- let me see -- some parents came to pick their  
12 kids up that day early toward the end of the school  
13 year, so they had activities and things planned. One  
14 student specifically had a doctor's appointment that  
15 he was trying to get to that particular day.

16 I will -- I will say that COVID does impact  
17 the attendance, but if we have to close the whole  
18 program down, then all students are given activities  
19 in their county of residence, so they'll be counted as  
20 receiving their services and instructions and  
21 attendance.

22 Q. Okay. And when was the last time you had to  
23 close the program completely due to COVID?

24 A. Let me think. So it was probably first  
25 semester of August 2021 that we had to close, and I

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1 want to think it was between, sometime between  
2 December, November. Most of the time if we had to  
3 close after that it might have been specific classes  
4 that had to shut down.

5 Q. Okay. All right. If students are sent home  
6 due to behavior issue --

7 A. Mm-hmm (affirmative).

8 Q. -- how does that count for attendance  
9 purposes?

10 A. It would be coded as a -- even if it's for  
11 behavior, it would be counted as a suspension whether  
12 it's part day or full day.

13 Q. And do you also have to identify it as an  
14 excused or unexcused absence?

15 A. We have not. But for Infinite Campus when  
16 you enter the suspension -- I mean, the students went  
17 home because of behavior, it's going to automatically  
18 list it as a suspension.

19 Q. And do you discuss your enrollment numbers  
20 with anyone from the State Department of Education?

21 A. Not on an ongoing basis. Sometimes they  
22 will email us and ask us our number, enrollment  
23 numbers, are they correct, like at the end of the year  
24 when they are looking at calculations; again, they  
25 want to make sure we're counting all of our kids. So

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1 they'll send us out an inquiry about whether or not  
2 those numbers are accurate.

3 Q. And do you have regular reporting  
4 requirements to the State for attendance?

5 A. Other than what the school system required,  
6 no, not to my knowledge.

7 Q. Okay. And my last attendance question. Do  
8 your attendance rates affect funding that you receive  
9 from the State or the LEA or RESA in any way?

10 A. They would. If I had a student who was out  
11 10 days prior to our actual count, then it would  
12 impact our funding because I wouldn't be able to count  
13 that student.

14 Q. So the student would need to be present at  
15 the time that you-all --

16 A. Within those ten days, yes.

17 MS. HAMILTON: How are you doing? Do you  
18 need a break?

19 MS. FLETCHER BOWDEN: I think probably  
20 pretty soon.

21 THE WITNESS: Like 12:00.

22 MS. FLETCHER BOWDEN: High noon.

23 BY MS. HAMILTON:

24 Q. Okay. Well, we're going to transition to a  
25 different topic, and I want to learn more about just

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1 some staff-related issues and matters in your program.

2 Starting with just some general questions  
3 about hiring and recruitment, who determines the  
4 staffing needs in your GNETS program?

5 A. That's done in our planning meetings, and  
6 also looking at the number of students that we have  
7 and the needs of the students. So it would be the  
8 GNETS director along with the personnel director or  
9 personnel coordinator who's hired to -- who works with  
10 us.

11 Q. And the personnel coordinator is with  
12 Richmond?

13 A. Mm-hmm (affirmative). And sometimes we work  
14 within the school systems, the other school systems as  
15 well.

16 Q. Do you know if that's true for all GNETS  
17 programs?

18 A. I don't know.

19 Q. Okay. All right. So then what is the  
20 process for hiring new personnel when an opening is  
21 created or a need is identified?

22 A. So we -- typically I contact a human  
23 resources coordinator assigned, and if we have a  
24 coordinator who works with certified staff and  
25 classified staff, let them know it's a vacancy. Also

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1 alert my supervisor, my direct supervisor, to let them  
2 know there is a vacancy and go work with them to get  
3 the job posted. Once it's posted, then I have access  
4 to the it's called Talent Ed where I can go in and see  
5 who has applied for the position.

6 Once we have a list of candidates, I go  
7 ahead and schedule the interviews. The coordinators  
8 and I interview the staff and make a recommendation  
9 for employment and turn that in to our HR coordinator  
10 who will -- well, prior to even turning it in, we do  
11 reference checks. Our HR coordinator receives the  
12 information, determines that the person is eligible  
13 for hire, and then they offer the position if a  
14 position is offered.

15 Q. Okay. So going back a bit, where are the  
16 positions advertised?

17 A. On the board website.

18 Q. Okay.

19 A. And they -- and I'm not sure, but in the  
20 past I know that, depending on the positions, they  
21 have opened them up to other sites as well like Teach  
22 Georgia and things like that. I'm not sure if that's  
23 still the case, but it has been in the past.

24 Q. And then you said that you can see who  
25 applies through a website called Talent Ed?

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1 A. Mm-hmm (affirmative). It's a web-based  
2 program that the school system uses. And that's where  
3 the applicants apply for the position.

4 Q. Okay. So once the vacancy -- sorry. Once  
5 the hiring notice window ends, you mention that you  
6 can then schedule interviews.

7 A. Mm-hmm (affirmative).

8 Q. Do you have to consult with anyone before  
9 you determine who you want to interview, or can you  
10 pretty much pick whoever you want?

11 A. I'm constantly speaking with the  
12 coordinators about the applicants who have applied.  
13 We have the autonomy to look at that list of  
14 applicants and make recommendations for who you want  
15 to consider for interviewing and for hiring.

16 If there is a question about somebody's  
17 credentials or qualifications, I definitely want to  
18 make sure that I go through the coordinator for that.

19 Q. And just to make sure I'm clear, when you  
20 say "coordinator," are you referring to the Richmond  
21 County personnel coordinator?

22 A. Mm-hmm, the human resources coordinator.

23 Q. And in terms of the coordinators  
24 participating in these interviews, is it the same  
25 person?

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1 A. No. Well, it could be. They could be part  
2 of that. But the coordinators for the programs  
3 participate as well.

4 Q. Okay.

5 A. Because they are the ones who are going to  
6 be working with the staff day to day.

7 Q. Okay. So the coordinator for the Thomson  
8 staff and the Richmond site?

9 A. Correct.

10 Q. All right. And so you conduct these  
11 interviews, and then who did you say makes the final  
12 decisions about who gets hired?

13 A. Human resources will reach out to the  
14 candidate to let them know that they've been  
15 considered for employment. They will gain the  
16 information on whether or not the person accepts the  
17 position, and they'll let us know.

18 Q. Okay. Does the LEA have -- I guess when you  
19 say human resources, is that with --

20 A. Richmond County.

21 Q. -- Richmond County?

22 A. Yes.

23 Q. So they would have a say in whether someone  
24 gets hired?

25 A. Right. Because they would go through to

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1 make sure that the person meets the employment  
2 requirements.

3 Q. Okay. Would anyone from the RESA have the  
4 ability to weigh in on whether someone gets hired?

5 A. Not with -- so the RESA is not directly  
6 involved in Richmond County. If I had to do a direct  
7 hire through the school systems outside of Richmond  
8 County, then they would. And I have had that happen.

9 Q. Okay. What would be the circumstances where  
10 that would happen?

11 A. If there was a child who was in need of  
12 somebody that was child-specific, then the school  
13 system for that student would be responsible for  
14 funding that position. And then they would make the  
15 recommendation -- they would make the final  
16 recommendation on whether or not that person would be  
17 hired. And in some cases they might hire them and  
18 then send them to us to have them work on our program.

19 Q. And then what about the State Department of  
20 Education, do they ever have the ability to approve or  
21 weigh in on anyone who is hired?

22 A. I don't know if they have the ability, but  
23 they have not up to this point.

24 Q. Okay. And does the State Department of  
25 Education participate in any way in hiring for your



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1 GNETS staff?

2 A. They give us information about not only just  
3 the State Department, but the Georgia Professional  
4 Standards -- so the answer is no.

5 Q. Okay. Well, you're about to say the Georgia  
6 Professional Standards?

7 A. They give us the guidelines for who can be  
8 hired, and anybody that we hire definitely has to meet  
9 those guidelines before they can be considered for  
10 employment.

11 Q. Does the State Department of Education ever  
12 recommend individuals for hire -- to hire?

13 A. No, they have not.

14 Q. And you mentioned that the Georgia  
15 Professional Standards Commission sets the  
16 qualifications.

17 A. Mm-hmm (affirmative).

18 Q. For teachers who are employed in GNETS, what  
19 are the requirements in order for them to be able to  
20 work for your GNETS program?

21 A. They would definitely have to meet the  
22 minimum requirements that are available, at least the  
23 minimum requirements that are available, for  
24 employment.

25 Of course, we have other things that we look

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1 at as well outside of those requirements like their  
2 background, their experiences related to mental  
3 health, do they have experience with that, do they  
4 have experience working with students at risk.

5 And it may not always be in an educational  
6 setting. It might be in a current position or a  
7 previous position that they have. But they definitely  
8 have to meet those minimum qualifications. They have  
9 to have a bachelor's. They have to pass the  
10 fingerprint and criminal check.

11 Of course, we always want to get, you know,  
12 staff who are highly qualified. But we also have the  
13 opportunity to hire people who come from an  
14 alternative track who agree to work in an area and  
15 possibly go back to school to get a degree in that  
16 particular area of, like, special education.

17 Q. Okay.

18 A. And that's for all, any program, whether  
19 it's a student with disa- -- with special education,  
20 general education, Spanish. That's something that's  
21 offered for any teacher who wants to come to the field  
22 of education.

23 Q. Okay. And when hiring for other, like,  
24 nonteaching positions, would you also consult the  
25 Georgia Professional Standards Commission's guidelines

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1 for the requirements for other positions as well?

2 A. Absolutely. We follow those guidelines, and  
3 we make sure that we work through human resources to  
4 make sure that the people who are being considered for  
5 employment like paraprofessionals, social workers,  
6 counselors, that they meet their requirements through  
7 the Professional Standards Commission.

8 Q. Okay.

9 THE VIDEOGRAPHER: Seven minutes.

10 MS. FLETCHER BOWDEN: Is it about time for a  
11 break? You've got one more short topic?

12 MS. HAMILTON: We'll see.

13 All right. I'm going to hand the court  
14 reporter what I'd like to have marked as  
15 Plaintiff's Exhibit 197.

16 (Plaintiff's Exhibit P-197 marked.)

17 BY MS. HAMILTON:

18 Q. All right. I'm handing you Plaintiff's  
19 Exhibit 197. And this is a Staff Spreadsheet produced  
20 by your program response to our August 2021 subpoena.

21 A. Mm-hmm (affirmative).

22 Q. The first page of this document is stamped  
23 using the unique identifier from the Sand Hills  
24 program 000315.

25 A. Mm-hmm (affirmative).

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1 Q. And I want to turn to the very last page of  
2 the spreadsheet. At the top it says Year 2021-2022.

3 A. Okay.

4 Q. Are you familiar with this document?

5 A. It looks familiar, yes.

6 Q. Okay. Am I correct that this is a  
7 spreadsheet -- and we did not make any changes to this  
8 for redaction purposes.

9 A. Mm-hmm (affirmative).

10 Q. -- that this is a spreadsheet reflecting  
11 staff information for the '21-'22 school year?

12 A. Yes.

13 Q. Okay. And your program provided this to us  
14 in response to the subpoena?

15 A. That's correct.

16 Q. Okay. All right. So just looking at this  
17 document as a whole, it appears that some staff serve  
18 the program as a whole, and others serve specific  
19 locations; is that correct?

20 A. That's correct.

21 Q. Okay. What are the positions of staff who  
22 serve the program as a whole, and what are their  
23 roles?

24 A. So you would have the director because I  
25 work between both programs.

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1 Q. Mm-hmm (affirmative).

2 A. You have the support providers, which would  
3 be the counselor, social worker, and the GNETS  
4 liaison.

5 Q. Okay. And I don't see the GNETS liaison on  
6 this spreadsheet, but is he or she -- like, I don't  
7 see it labeled by position, but are they on here?

8 A. They are not on here. She wasn't hired at  
9 the time.

10 Q. Okay. And what's her name?

11 A. Rexanne Faulkner.

12 Q. Can you spell that, please?

13 A. R -- you know what, that's not her first  
14 name. Teresa Rexanne Faulkner.

15 Q. Teresa. T -- can you spell that, please?

16 A. T-E-R-E-S-A. R-E-X-A-N-N-E.  
17 F-A-U-L-K-N-E-R.

18 Q. Okay. And who employs the individuals you  
19 just named?

20 A. You mean the LEA?

21 Q. Mm-hmm (affirmative).

22 A. Richmond County.

23 Q. And are all of those positions funded by  
24 Richmond County?

25 A. I was going to say --

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1 Q. Okay. Go ahead.

2 A. Richmond County serves as the flowthrough.

3 Q. Okay.

4 A. So they -- but the social worker is funded  
5 through a special grant provided by the State of --  
6 our GNETS program through the State.

7 Q. Mm-hmm (affirmative). Okay. And then what  
8 about your position in terms of who funds that  
9 position?

10 A. It's funded through the State grant for  
11 GNETS.

12 Q. Okay. And are any of the other individuals  
13 besides you and the social worker funded by the State  
14 grant for GNETS?

15 A. The counselor and the coordinator.

16 Q. And I know we haven't covered the  
17 coordinators yet on the spreadsheet, but each one of  
18 them is assigned to a different site; correct?

19 A. That's correct.

20 Q. Okay. Okay. So then that leaves the  
21 support provider and the GNETS liaison. Are those  
22 both funded by the school district directly?

23 A. The GNETS liaison is funded through the  
24 Richmond County Special Ed department through their  
25 IDA fund. And who was the last one that you

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1 mentioned?

2 Q. I believe I wrote down support provider.

3 A. I'm not sure which support provider you're  
4 referring to.

5 Q. Let's see. When I -- let's see. In  
6 response to the question what are the positions who  
7 serve the program as a whole, I have written down  
8 director and then --

9 A. I think I said support providers, the  
10 counselor and the social worker.

11 Q. Oh, support?

12 A. Okay. All right.

13 Q. That was covering the counselor and social  
14 worker.

15 A. Yes.

16 Q. Okay. Great. So just to recap, so the  
17 director, the social worker, and then counselor are  
18 all funded through the State GNETS grant?

19 A. Correct.

20 Q. The GNETS liaison through the Richmond  
21 County Special Education Department IDEA funds?

22 A. Yes.

23 Q. And those are the individuals who serve the  
24 program as a whole?

25 A. Right.

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1 Q. And then at each of the sites you have your  
2 two coordinators, and they are both funded by the  
3 State grant?

4 A. That's correct.

5 Q. Okay. So do you have any other staff who  
6 serve in multiple locations?

7 A. Earlier I mentioned the additional funding  
8 that we got to provide therapeutic service providers.  
9 They serve across both locations, so they serve the  
10 Thomson and the Richmond County students.

11 Q. Okay.

12 A. Now, that's the social worker, the LPC  
13 Dr. Jackson, and the Namaste Group. And we have one  
14 other -- yeah, the Namaste Group. The other one is  
15 not being paid.

16 Q. Okay. And then can you break out the rest  
17 of your staff starting with the Thomson location? So,  
18 like, how many teachers, how many coordinators, how  
19 many paraprofessionals and so forth.

20 A. Let's see.

21 Q. And if your recollection -- this is based at  
22 the point in time when we received this.

23 A. Okay. So I can tell you both. As to  
24 Thomson, Thomson has six teachers. At the time of  
25 this, they had -- now it's showing six, but it looks



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1 like I think they had eight paraprofessionals.

2 Q. And just to double-check, so for teachers --  
3 for teachers at Thomson, I'm counting seven.

4 A. Oh, the PE teacher, that's seven. Six  
5 classroom -- six special ed teachers and one PE  
6 teacher.

7 Q. Okay. And then how many paraprofessionals  
8 did you-all have last year at Thomson?

9 A. I have got five listed here, but I want to  
10 say there were eight by the end of the school year.

11 Q. Okay. And then any other positions unique  
12 to Thomson?

13 A. No.

14 Q. Okay. And I know we already talked about  
15 the coordinator. Okay.

16 THE VIDEOGRAPHER: Do I need to identify  
17 when new people come in because when we hear a  
18 ding?

19 (Comments off the record.)

20 BY MS. HAMILTON:

21 Q. And what about at the Richmond site, how  
22 many teachers and paraprofessionals?

23 A. Six teachers in Richmond.

24 Q. Mm-hmm (affirmative).

25 A. Eight paraprofessionals.

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1 Q. And when I had counted this, I had counted  
2 nine. But I don't know if Tanisha Dorsey, if she also  
3 is included in your count.

4 A. There are nine.

5 Q. When we were on site we were told that two  
6 of your paraprofessionals were doing double duty also  
7 as, I believe, the bus driver and the monitor; is that  
8 correct?

9 A. At the Thomson site, yes.

10 Q. At Thomson. Okay.

11 A. (Nods head affirmatively.)

12 Q. And how did that work practically in terms  
13 of them completing their responsibilities for one and  
14 also doing the other?

15 A. It was very smooth because the students that  
16 they picked up, once they got on site they would go  
17 into their classrooms so they were able to transfer  
18 the students and bring them bring them to their  
19 classes.

20 Q. Okay.

21 A. So we didn't have any issues with that.

22 Q. Okay. And then and besides the positions  
23 that we've walked through so far, are there any other  
24 positions? I see on here there is a program  
25 evaluator.

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1 A. Mm-hmm (affirmative).

2 Q. Where are they based?

3 A. Richmond County.

4 Q. Okay. And do they only serve the Richmond  
5 site?

6 A. They are for the program. So he would  
7 basically manage the files for the students in the  
8 program.

9 Q. Okay. There is also a bookkeeper?

10 A. Mm-hmm. She manages the personnel, budgets  
11 and all that information for both programs.

12 Q. Okay.

13 A. And she's located in Richmond County.

14 Q. Okay. There is an administrative assistant?

15 A. She's out in Thomson.

16 Q. Okay. And does she serve the entire  
17 program?

18 A. Huh-uh (negative). Just Thomson.

19 Q. Just Thomson. Is there an administrative  
20 assistant for Richmond?

21 A. No.

22 Q. Do they need one?

23 A. The staff would probably say yes, but I  
24 don't think so right now.

25 Q. Okay. And then are there any other paid

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1 positions from a staff standpoint who aren't reflected  
2 on this spreadsheet from last year?

3 A. That are assigned specifically to GNETS?

4 Q. Yes.

5 A. No.

6 Q. Okay. Would there be individuals who aren't  
7 assigned specifically to GNETS who you would include  
8 as staff?

9 A. Yes.

10 Q. What would that look like?

11 A. It might be the nurse who comes on site.

12 Q. Mm-hmm (affirmative).

13 A. It might be the school psychologist who  
14 comes on site. It might be the public safety officer  
15 who works on site.

16 Q. Mm-hmm (affirmative).

17 A. And then, of course, we have custodial staff  
18 who maintain the facilities. We've got the staff who  
19 provide support for school nutrition.

20 Q. Mm-hmm (affirmative).

21 A. They might be there as well.

22 And then we have instructional support staff  
23 that are assigned to each school of who come out and  
24 do professional learning, meet with the teachers,  
25 especially our new teachers, through teacher

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1 induction.

2 So there are a lot of other service  
3 providers. We get support through information  
4 technology. We have a Caleb who comes out to work  
5 with us; as a matter of fact, Caleb used to work with  
6 us at both locations. Thomson and Richmond, we get IT  
7 support from them. We have behavioral support  
8 specialists who come on site.

9 So it would be people like that. They work  
10 with the stool system, but they still provide support  
11 to our students and our staff.

12 Q. Okay. Do all of these individuals work for  
13 the school system?

14 A. No. Some of them work for the other school  
15 systems; like the behavioral support specialists,  
16 although we have some in Richmond, we also have some  
17 who work in the various school systems at the Thomson  
18 site, like, there might be somebody from McDuffie  
19 County, we've got speech therapists in all counties  
20 where we have students we receive speech services who  
21 come in and provide support.

22 Q. Okay. So they are all coming from one or  
23 more of the local school systems?

24 A. That is correct.

25 Q. Okay. And how many nurses do you have?

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1 A. We have a half-time nurse who's on site in  
2 Richmond, and we have an on-call nurse in Thomson.

3 Q. Okay. What about the school psychologist?

4 A. School psychologist, he comes in as-needed,  
5 but he is assigned. We have one assigned to our  
6 program in Richmond, and it will be as-needed in the  
7 local school systems who participate in the Thomson  
8 site.

9 Q. Okay. The public safety officer?

10 A. He's housed in -- we have one who's housed  
11 in the Thomson site. If we need him we can have -- we  
12 have access to him as well as there is one who's  
13 housed at the alternative school in Thomson. If we  
14 need that person, he'll come over and provide support  
15 too.

16 Q. The custodial staff?

17 A. We have a person assigned to our floor in  
18 Richmond. In addition to, we have access to the other  
19 custodians in Richmond County. And in Thomson we have  
20 our own custodian who comes in and maintains the  
21 facilities.

22 Q. The school nutrition staff?

23 A. They are assigned to -- both of them are  
24 assigned to the buildings. Got a school nutrition  
25 staff for Thomson, and we have a school nutrition

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1 staff for Richmond.

2 Q. The instructional support staff?

3 A. They are assigned to different schools and  
4 come on site to provide support in Richmond. I'm not  
5 sure about the other school systems because we  
6 typically do group meetings with them if we needed  
7 support.

8 Q. Okay. Does Thomson receive support through  
9 the instructional support staff?

10 A. In Richmond they can, yes, or they do.

11 Q. Sorry. Just to clarify, the -- at the  
12 Thomson site they can receive support from the  
13 Richmond --

14 A. Right.

15 Q. -- instructional support staff?

16 A. That is correct.

17 Q. Okay. The IT staff?

18 A. Both sites have support from the Richmond  
19 County.

20 Q. And then the behavioral support specialist?

21 A. They would have support based on their  
22 individual school systems.

23 Q. And for all of those, are those positions  
24 all funded by -- actually, I'm going to rephrase this.  
25 Who's funding all of those positions?

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1 A. The LEAs that participate.

2 Q. Does the State provide any money towards  
3 those positions?

4 A. No, not through GNETS. Now, I can't answer  
5 for outside of GNETS, but they don't provide any  
6 funding through GNETS that I'm aware of.

7 Q. Okay.

8 (Ms. Hamilton and Ms. Gardner-Womack  
9 conferring.)

10 MS. FLETCHER BOWDEN: Good time for a break?

11 MS. HAMILTON: We can take a break now --

12 MS. FLETCHER BOWDEN: Okay.

13 MS. HAMILTON: -- this is a good time.

14 (Comments off the record.)

15 THE VIDEOGRAPHER: Sorry. Do you want me to  
16 go off the record? I'm so sorry. My apologies,  
17 everyone. Off the record at 12:09 p.m.

18 (Recess 12:09 p.m. - 1:20 p.m.)

19 THE VIDEOGRAPHER: On the record at  
20 1:20 p.m.

21 BY MS. HAMILTON:

22 Q. So before we took a break for lunch we were  
23 talking about staffing, and I want to return to  
24 Exhibit 197.

25 I want to start by looking at this first



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1 column that says Funding Source and have you walk me  
2 through what each of these different codes mean.

3 So for this first set of staff, it appears  
4 to be teachers or paraprofessionals. There is a code  
5 that says 8110-11000.

6 A. Mm-hmm (affirmative).

7 Q. What does that mean?

8 A. Well, that's the code that they give.  
9 These, these particular people are being paid from the  
10 Richmond County general fund.

11 Q. Okay. All right. So then it looks like the  
12 next set of teachers are being funded through  
13 SED10-11000. And this is one, two, three, four, five,  
14 six, seven, eight, nine teachers. Who's the source of  
15 this funding?

16 A. That's GNETS State grant.

17 Q. Okay. And the next set of teachers, sorry,  
18 the next set of staff appears to be for  
19 paraprofessionals and they are funded through  
20 SED10-14000. What's the source of that funding?

21 A. You say they are paraprofessionals?

22 Q. Yes.

23 A. Okay. Are you looking at the --

24 Q. For 2021 through the 2022 school year.

25 A. Okay.

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1 MR. FLETCHER: Are you on page 319?

2 MS. HAMILTON: I'm -- yes.

3 MR. FLETCHER: Okay.

4 MS. HAMILTON: So 319.

5 MR. FLETCHER: Okay.

6 MS. HAMILTON: I can start over at the top.

7 I'm sorry. We were just reading --

8 MR. FLETCHER: She's on a different page,

9 so.

10 MS. HAMILTON: Okay.

11 BY MS. HAMILTON:

12 Q. And sounds like there may not have been a  
13 lot of staff turnover over those years, but.

14 A. That's a State grant, too. That's a State  
15 grant.

16 Q. Okay. And just to recap, so the first three  
17 teachers and paraprofessionals these are funded  
18 through Richmond County?

19 A. Yes. Those are general funds from Richmond  
20 County.

21 Q. Okay.

22 A. And the next set is a State grant for GNETS.

23 Q. Of teachers?

24 A. Correct.

25 Q. Okay. And then the set of four

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1     paraprofessionals, this is also another State grant?

2             A.     That's correct.

3             Q.     Okay.

4             A.     Well, it's the same State grant. It's just  
5     got different object codes, object numbers.

6             Q.     Okay.

7             A.     Mm-hmm (affirmative).

8             Q.     And then the counselor listed here has a  
9     code SED21-17300. Is this position also funded by the  
10    State?

11            A.     It is. It's a GNETS State grant.

12            Q.     And I think we may have talked about this  
13    earlier, but your position also has a similar code,  
14    SED-21-19000, and that's paid for through the State  
15    grant?

16            A.     That's correct.

17            Q.     And then the two coordinator positions,  
18    that's also a State grant?

19            A.     A GNETS State grant, yes.

20            Q.     And I guess to clarify, for all those other  
21    State grants, were those the GNETS State grant?

22            A.     That's correct.

23            Q.     And then underneath that says: Program  
24    evaluator and bookkeeper. Are those two also paid  
25    through the GNETS State grant?

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1 A. Yes.

2 Q. Okay. And then there are six  
3 paraprofessional positions listed and that you have a  
4 code of SEDVIB10-14000. What's the source of their  
5 funding?

6 A. That's our GNETS, the funding that we  
7 receive through federal, federal grants, our IDEA  
8 fund.

9 Q. Okay. And then there is another  
10 paraprofessional position that's listed VIB10-14000.  
11 What's the source of that?

12 A. That's paid for through the IDEA funds for  
13 Richmond County.

14 Q. Okay. And then there are three other  
15 positions: Social worker, administrative assistant  
16 and teacher, and those are all listed as contracted.  
17 What does that mean?

18 A. That means that they weren't direct hires  
19 for the school system. They were working through a  
20 contracting agency.

21 Q. Okay. And who, what was the source of the  
22 funding for those positions?

23 A. The social worker position was funded  
24 through a special State grant to a -- to provide  
25 additional therapeutic services.

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1 And the administrative assistant and the  
2 teachers were funded through the SED general fund. I  
3 mean, excuse me, SED State grant.

4 Q. Is that the GNETS grant?

5 A. GNETS State grant, yes.

6 Q. Okay. Okay. Another column I want to ask  
7 you about is the Professional License and  
8 Certification column. It's the second-to-last from  
9 the end. And I just want to make sure, so if there  
10 are numbers listed here, is that the license number or  
11 the certification number for the position listed?

12 A. Yes.

13 Q. Okay. And if there is not a number listed,  
14 does that mean the person does not have a license  
15 number or certification number?

16 A. Yes, or they were in the process of  
17 obtaining their license.

18 Q. Okay.

19 A. Mm-hmm (affirmative).

20 Q. Does it mean that they currently don't have  
21 it -- that they currently don't have the license or  
22 certificate at that point in time?

23 A. It may have been that when this was done  
24 they didn't have it.

25 Q. Okay. So looking at the second set of names

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1 here that were funded by one of the State GNETS grants  
2 there are three teachers that don't have a license or  
3 certificate number listed. Does that mean that those  
4 teachers did not have their license or certificate at  
5 the time at which you submitted this?

6 A. That is correct. I think we did this in  
7 August.

8 Q. Okay. And then in the next set there is  
9 four paraprofessionals, and it appears that two of the  
10 four did not have their professional license or  
11 certificate for that position; is that correct?

12 A. Well, they hadn't been issued at the time  
13 that we did this report.

14 Q. Okay. Then there is the counselor listed  
15 here and there is no number. Does that mean that the  
16 counselor did not have the requisite professional  
17 license or certificate at that point?

18 A. It had not been issued at the time, that's  
19 correct.

20 Q. And then near the end of this chart there is  
21 another paraprofessional listed, and there is no  
22 license number. Does that mean that that  
23 paraprofessional did not have a professional license  
24 or certificate at this time?

25 A. That's correct.

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1 Q. Okay. And then there is also a social  
2 worker listed. Does it mean that the social worker  
3 did not have their professional license or  
4 certificate?

5 A. At the time they did not, yes.

6 Q. Okay. So for the teachers who did not have  
7 their professional license or certificate, how were  
8 they able to work at the GNETS program without having  
9 that fully completed?

10 A. So the State of Georgia does allow for  
11 teachers to come in through an alternative preparation  
12 track. Part of what happens is that our human  
13 resources department goes in and makes sure that  
14 anybody that we're recommending for hire meets the  
15 requirements. And so although they didn't have a  
16 certificate issued at the time, they were eligible for  
17 certification and had just not received it yet.

18 Q. And when you're hiring, are you looking for  
19 fully certified teachers normally?

20 A. Absolutely.

21 Q. Okay. What led to you having to hire  
22 teachers who weren't fully certified?

23 A. There is a significant teacher shortage,  
24 especially in the area of special education.

25 Q. And in the instances of these teachers, for

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1 example -- and, again, I think there were one, two,  
2 three teachers listed and one, two, three  
3 paraprofessionals listed -- for the teachers if they  
4 were not fully certified, what certification are they  
5 lacking? So, for example, are they lacking a special  
6 education certification, are they lacking, like,  
7 certification to teach elementary school, or  
8 secondary, or content area?

9 A. It would be special education.

10 Q. And to teach in the GNETS program do all  
11 teachers have to have a special education  
12 certification?

13 A. Yes, that's preferred. Again, you have an  
14 option to work toward certification once you're hired.

15 Q. And I think we talked about this earlier,  
16 but who sets those requirements?

17 A. Georgia Professional Standards Commission.  
18 And they provide a timeline for when the applicants  
19 had to complete their certification requirements.

20 Q. Okay. And is that a commission or  
21 department underneath the Georgia Department of  
22 Education?

23 A. No, that, they are a separate entity.

24 Q. Okay. Do you know if it's a government  
25 agency?



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1           A.    I don't know if it's a government agency. I  
2 know it's the Georgia Professional Standards  
3 Commission.

4           Q.    How long do teachers have to work toward  
5 their full certification?

6           A.    It's individualized, and Georgia  
7 Professional Standards Commission would determine how  
8 long it will take. They look at their educational  
9 background. They look at their experiences, any types  
10 of assessments that they take, and they would  
11 determine the amount of time that a person would have  
12 to complete.

13                   It could be something as simple as maybe  
14 they came from South Carolina and all they needed to  
15 do was take an Exceptional Child's course and pass the  
16 State required assessment, which they would give them  
17 a year for that up to three, even four years.

18           Q.    And I guess similarly for the social worker  
19 and the counselor who at this point did not have their  
20 professional license or certification, from a hiring  
21 standpoint would you want to hire people in those  
22 positions who are certified?

23           A.    Yes, or have the ability to become  
24 certified. Both of them have the ability to become  
25 certified. They came from different tracks, one came

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1 from South Carolina, and one was coming from the  
2 private sector.

3 And when we're looking at hiring, other  
4 things that we look at is what is their background.  
5 And so those all play a role in who we would select or  
6 recommend for a position.

7 Q. For next school year do you have any  
8 teachers who have been hired who are not fully  
9 certified?

10 A. Almost all of our teachers are returning  
11 except for one. They don't have their full clear  
12 renewable certification, but they will have a either  
13 waiver certificate or an induction certificate.

14 Q. And you said all teachers except for one are  
15 returning. Which one is not returning?

16 A. Actually, I have three who's not returning.  
17 Ms. Thomson is not returning, Ms. Shipman is not  
18 returning, and Ms. Lewis is not returning.

19 Q. And so of those teachers, two of them were  
20 fully certified. And then Ms. Lewis at this time had  
21 not obtained her certification. Do you know if  
22 Mr. Cook or Ms. Derrico have completed their  
23 certification at this point?

24 A. All of them have had certificates before the  
25 end of the school year. They just had not received

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1     them when he turned this information in. So everybody  
2     on here was a that was in the system did receive a  
3     certificate.

4             Q.     So Mr. Cook and Mr. and Ms. Derrico at this  
5     point now have their certificates?

6             A.     Yes, mm-hmm.

7             Q.     Okay. Going into next school year.

8                     And then for the paraprofessionals,  
9     Ms. McNear, Mr. Washington, and Ms. Dorsey did not  
10    have their certificates when this was submitted. Are  
11    they returning next year?

12            A.     Ms. McNear is not, Mr. Washington is not.  
13    Ms. Dorsey is, and she received her certificate.

14            Q.     Okay. And is Ms. Mims returning as a  
15    counselor?

16            A.     She is.

17            Q.     Has she obtained her certificate?

18            A.     She has.

19            Q.     And I say certificate or license, whichever  
20    one is applicable?

21            A.     Mm-hmm (affirmative).

22            Q.     And Mr. Adams, is he returning as a social  
23    worker?

24            A.     She is.

25            Q.     And has he obtained his certificate or

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1 license?

2 A. She has.

3 Q. And then for the teachers who do have  
4 numbers listed here, does this indicate that they  
5 actually have received their special education  
6 certification, or could this also indicate that they  
7 have obtained a waiver?

8 A. Could be a waiver induction. It could  
9 indicate that they have some certification on file.

10 Q. Okay.

11 A. Not necessarily a special ed teaching  
12 certificate.

13 Q. Okay. So then to be clear, to the extent  
14 that Ms. King had -- the first person listed has a  
15 license number here, this number doesn't -- it's not a  
16 verification that she actually has -- that she's a  
17 fully certified --

18 A. Correct.

19 Q. -- special education?

20 A. It means she's met the minimum required to  
21 teach in the state of Georgia.

22 Q. And that's true for the others as well?

23 A. That's correct.

24 Q. Thank you for clarifying that.

25 A. Mm-hmm (affirmative).

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1 Q. So do you know of the teachers who are  
2 listed here how many are actually fully certified?

3 A. Yes. It would be Mr. Ewing, and -- excuse  
4 me -- it would be Dr. Nealey, Patricia Nealey.

5 Q. And everyone else is working toward their  
6 full certification?

7 A. Yes.

8 Q. Did you have any vacancies last school year?

9 A. I did, yes.

10 Q. How many, and for what positions?

11 A. It would be for five -- are you talking  
12 about the end of FY '22?

13 Q. At the time that you completed this.

14 A. At the time I completed this there was one  
15 vacancy for the person who had passed away.

16 Q. And that was a paraprofessional position?

17 A. Yes.

18 Q. Were you able to replace that person?

19 A. No, it remained a vacancy. But we did have  
20 a sub in place for the rest of the year.

21 Q. And did that serve -- substitute have the  
22 requisite license or certification?

23 A. No.

24 Q. Okay. And then for the upcoming school year  
25 do you have any vacancies?

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1 A. Right now I have one coordinator's position  
2 and four paraprofessional positions.

3 Q. Which coordinator position?

4 A. Richmond sites.

5 Q. And what is the plan currently in terms of  
6 moving forward without having a coordinator right now?

7 A. We're interviewing tomorrow.

8 Q. And similar for the four paraprofessionals  
9 positions?

10 A. We're interviewing Thursday. And that's  
11 been ongoing.

12 Q. Do you anticipate any other staffing changes  
13 for next school year?

14 A. Not at this time.

15 Can I go back to your question about the  
16 vacancies?

17 Q. Sure.

18 A. For clarification, I turned in -- I have one  
19 teacher vacancy, but I turned in somebody. That  
20 person has not committed yet. You want me to list  
21 that as a vacancy?

22 Q. For next year, or for?

23 A. For 2023.

24 Q. 2023. Okay. So you do have one teacher  
25 vacancy, but you likely have one who will fill that

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1 position?

2 A. We're turning in a recommendation for that.

3 Q. Okay. Thank you.

4 A. Mm-hmm (affirmative).

5 Q. And I did just want to circle back to make  
6 sure I'm clear on who's fully certified and who isn't.  
7 I know you said that Mr. Ewing and Dr. Nealey are  
8 fully certified. There are two Nealeys on here? Is  
9 this --

10 A. Patricia Nealey.

11 Q. Patricia Nealey. So Dr. Nealey at the  
12 Thomson site?

13 A. Yes.

14 Q. And then Mr. Ewing at the Thomson site?

15 A. Yes.

16 Q. They are the only two teachers who are fully  
17 certified in special education --

18 A. Yes.

19 Q. -- at Thomson?

20 A. Mm-hmm (affirmative).

21 Q. And then how about at Richmond, do you have  
22 any teachers who are fully certified?

23 A. No, I don't.

24 Q. All right. We're going to switch gears  
25 again.

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1 A. Okay.

2 Q. And I wanted to talk to you, first of all,  
3 about the GNETS role.

4 MS. HAMILTON: And I am going to hand the  
5 court reporter what has previously been marked as  
6 Plaintiff's Exhibit 82.

7 (Plaintiff's Exhibit P-82 marked.)

8 BY MS. HAMILTON:

9 Q. And I'm handing you what's previously been  
10 marked as Plaintiff's Exhibit 82. This is a copy of  
11 the GNETS Rule 160-4-7-.15 which went into effect on  
12 July 5, 2017.

13 A. Mm-hmm (affirmative).

14 Q. Are you familiar with this document?

15 A. I am.

16 Q. And am I correct that this is a copy of the  
17 GNETS rule that was issued by the State DOE?

18 A. Yes, that's correct.

19 Q. Okay. How did you become familiar with this  
20 document?

21 A. Well, both as a special ed director and as a  
22 GNETS director it would be something that I would go  
23 on the website to look at for serving students and for  
24 students who might be considered for the program.

25 Q. And how did you first become introduced to



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1 this version of the rule?

2 A. At this time I was a special ed director, so  
3 any updates that were provided the State Department  
4 shared that with us.

5 Q. Okay. Did you receive a training on the  
6 GNETS rule?

7 A. I'm not going to say the rule specifically  
8 in 2017, but since 2017 we have. And also provided  
9 technical assistance from the State to share with  
10 School Systems and LEA.

11 Q. Who provided the training?

12 A. The State Department. They did a video that  
13 specifically went over the requirements of the State  
14 rule.

15 Q. And when did you the training, was that in  
16 your capacity working as a Special Education director  
17 or coordinator or through GNETS?

18 A. The State Department came out and provided  
19 technical assistance to all of the participating  
20 school systems. And I can't remember if that was this  
21 past school year, or the previous school year. But it  
22 was over the past two years they did that.

23 Q. Okay. So you received the training while  
24 serving as a GNETS director?

25 A. Correct, mm-hmm.

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1 Q. Who led that training?

2 A. It was -- the technical assistance was  
3 provided by the representatives at GaDOE; and, again,  
4 it was a video training that they provided. Just  
5 basically logged onto the website, clicked it, if we  
6 had questions, we could ask questions.

7 Q. Okay. Do you know -- so if you had  
8 questions do you know who was on the other side  
9 answering those questions?

10 A. I don't recall. I would imagine it was  
11 probably Ms. Cleveland or Ms. Stevenson.

12 Q. And what topics did the training cover?

13 A. It talked about the changes that were taking  
14 place with the GNETS program. It really focused in  
15 making sure you had the right type of data that you  
16 need for referring students. It went over the  
17 information in the State rules. And it talked about  
18 the roles and responsibilities of participating  
19 programs.

20 Q. Were you required to complete that training?

21 A. I don't recall if they said we're required,  
22 but I think that in my role as a special -- I mean,  
23 the GNETS director, it would be something I would be  
24 expected to do along with making sure that I shared it  
25 with the participating school systems.

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1 Q. Did you receive any written guidance or  
2 additional manuals with additional information about  
3 those GNETS role?

4 A. No, not outside of the two videos that were  
5 produced. There is a second video that has  
6 information, too. It's about a 45-minute video. It  
7 might be six minutes video. And the other one that  
8 went to this was a little bit longer.

9 Q. And so for those video trainings, were you  
10 required to watch them at a set time with other  
11 people, or was it just on your own?

12 A. I'm going to be perfectly honest, a lot of  
13 this is kind of merging together because we had so  
14 many virtual meetings. I recall us being in a virtual  
15 setting for these sessions.

16 Q. So there would have been other GNETS  
17 directors participating at the same time?

18 A. I don't know if there were other GNETS  
19 directors. I think there were other special ed  
20 directors included in the training because it was a  
21 technical assistance meeting, and they called us by  
22 regions.

23 Q. Do you recall receiving any sort of  
24 implementation guidance in writing from the State  
25 Department of Ed?

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1 A. I don't recall receiving anything in  
2 writing.

3 Q. So based on your knowledge of this document,  
4 does the GNETS role provide you as the director with  
5 the State DOE -- sorry -- with the Georgia DOE's  
6 expectations regarding your programs' duties and  
7 responsibilities?

8 A. Yes.

9 Q. Does the GNETS' role provide you with the  
10 parameters on the age of the students who can  
11 participate in the GNETS program?

12 A. Yes.

13 Q. Does the GNETS rule set forth the  
14 requirements on how to determine whether students are  
15 eligible for admission to GNETS?

16 A. It's not spelled out step by step, but it  
17 does provide some guidance.

18 Q. And when you say it's not spelled out step  
19 by step but provides guidance, what do you mean?

20 A. So and I may be going back to the other  
21 video where it talks about considering students for  
22 services, and so I'm referring to the Purpose and the  
23 Services on page 2. But it gives you some information  
24 on all the other pages, and I think it's ending on  
25 page 4.

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1 Q. So on page 2 in letter (a) --

2 A. Mm-hmm (affirmative).

3 Q. -- would you say that this paragraph sets  
4 forth which students are eligible to participate in  
5 GNETS?

6 A. It gives you overview of students should  
7 participate and the ages they should participate  
8 through.

9 Q. And on page 3 there is a section called  
10 Consideration for GNETS Services.

11 A. Mm-hmm (affirmative).

12 Q. How do you use this information?

13 A. We have something called providing  
14 questions, and we use this information that's here to  
15 guide the process for the consideration meeting, and  
16 also ensuring that we're following the compliance  
17 piece, we're making sure that we're notifying the  
18 individuals about the meeting.

19 And the other piece is making sure is that  
20 that functional behavior assessment and behavior  
21 intervention plan have been done within a year.

22 And that's on the Consideration for Services  
23 Guideline form that we follow as we go through the  
24 process for determining whether or not a student would  
25 be appropriate for services through the GNETS program.

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1 Q. And then starting at the bottom of page 5  
2 leading into page 6 it says: "The GNETS shall", and  
3 there is a list of responsibilities set out here by  
4 the State.

5 Can you quickly skim through those on your  
6 own and let me know if this is consistent with your  
7 understanding of your responsibilities?

8 A. (Witness reviewing document.)

9 Q. And it also continues onto the top of  
10 page 7.

11 A. Okay. (Witness reviewing document.) Yes.

12 Q. Are there any steps here that did not apply  
13 to your job description?

14 A. Absolutely not.

15 Q. Okay.

16 A. I could probably add some.

17 Q. Okay. And what would be any additions that  
18 you would add to this?

19 A. Making sure that you attend to those monthly  
20 meetings that we have, collaborating with outside  
21 agencies to ensure support not just in the school but  
22 sometimes our students need support outside of school.

23 Q. And I guess I should clarify, before you go  
24 too far, I guess I would say what would you add that's  
25 required by the State?

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1 A. Oh, nothing. I think that's pretty  
2 comprehensive.

3 Q. All right. So what I'd like to do now is  
4 actually walk through a few documents pertaining to  
5 the consideration of services process, and just the  
6 general process by which students get placed in the  
7 GNETS.

8 MS. HAMILTON: I'm going to hand the court  
9 reporter what I'd like to have marked as -- let's  
10 see where we left off -- 198.

11 (Plaintiff's Exhibit P-198 marked.)

12 BY MS. HAMILTON:

13 Q. I'm handing you Exhibit, Plaintiff's  
14 Exhibit 198. And this is a document entitled  
15 Consideration of Services packet that was produced by  
16 the Sand Hills GNETS program in response to our  
17 subpoena.

18 A. Mm-hmm (affirmative).

19 Q. The first page of this document is stamped  
20 using a unique identifier from the Sand Hills program  
21 000347. Are you familiar with this document?

22 A. Yes.

23 Q. Okay. What is it?

24 A. This is the packet that school systems or  
25 parents or agencies use to refer students to our

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1 program for consideration of services.

2 Q. Do you know who created this document?

3 A. I can say that as a special ed director I  
4 had input on creating the form, and I think it was  
5 created by a group of GNETS directors prior to me.

6 Q. When you began serving as a GNETS director  
7 were you told that you had to use this packet, or  
8 something similar?

9 A. No, I was not told that this is what I had  
10 to use.

11 Q. Okay. All right. So why do you-all use  
12 this packet?

13 A. For lack of a better answer is it's  
14 something that was in place prior to me coming. And I  
15 have always been of the MindSet is you don't change  
16 anything until you understand the full workings of it.

17 As a special ed director I used it. It's  
18 got a lot of really good information in there that  
19 would be used to help make a determination regarding  
20 whether or not a student would be in need of our  
21 services.

22 It doesn't just look at what goes on with  
23 the child at school. It looks at what goes on with  
24 the child in the community, and it takes information  
25 from multiple data sources. Because when we're



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1 looking at making decisions to place a student in a  
2 more restrictive placement, we don't take those  
3 decisions lightly, and we really do want to make sure  
4 that we're looking at all information that's available  
5 to anybody who's working with that student whether  
6 it's at home, or at school or within the community.

7 So as you look at the -- start going through  
8 some of the information in the program, what's done at  
9 school; what types of outside agencies do the parents  
10 have students involved in; is the child being  
11 prescribed medication; is the child being seen by a  
12 physician on a regular basis; does the child receive  
13 services through a psychologist or psychiatrist. All  
14 of that information is included. And then we look at  
15 what goes on in the school for that student.

16 So bringing all that information to the  
17 table helps us to make a better informed decision. So  
18 that's kind of how we use this document.

19 Q. And are those steps aligned with the  
20 Consideration of Services steps that are set forth in  
21 the GNETS rule?

22 A. Pretty close, if not, if not more.

23 Q. Okay. I was going to say is there anything  
24 that the State rule requires that's not required here  
25 in your packet?

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1 A. I don't think so. They require us to look  
2 at the child in a comprehensive manner before we look  
3 at making placement.

4 Q. All right. So starting with the first page  
5 at the bottom, the stamp number is 000348, there is a  
6 note that says: "Students in Richmond County.

7 Consideration of Services packet may be sent directly  
8 to the Sand Hills program." Students in these other  
9 counties, apparently the packet should go through the  
10 School System's Special Education Department.

11 What's the reason for the difference there?

12 MS. FLETCHER BOWDEN: Are we on the same  
13 page?

14 BY MS. HAMILTON:

15 Q. I'm sorry. This is the next -- I'm sorry.  
16 So the first page after the cover sheet.

17 A. 348.

18 Q. And 348 at the bottom.

19 And so there are two bullet points. The  
20 first one says for Students in Richmond County. The  
21 packet, once completed, would be sent directly to the  
22 GNETS program.

23 A. Mm-hmm (affirmative).

24 Q. And then it says for the others, other  
25 counties, the packet would go through the Special

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1 Education Department. What would be the difference  
2 there?

3 A. Well, my -- actually, the right now that has  
4 -- well, I guess I should back up. I'm not sure why  
5 there is a difference other than you've got multiple  
6 school systems, and it's better to operate with one  
7 person in each school system.

8 So the special ed director from each of  
9 those participating school systems would submit their  
10 packet to the Thomson site. And here -- and we're  
11 right on site so they have been bringing them to our  
12 program. So they were coming straight from the school  
13 for them to submit them.

14 Q. Okay. All right. On the next page at the  
15 bottom the stamp is 000349.

16 A. Mm-hmm (affirmative).

17 Q. There is discussion in the first two  
18 paragraphs about students who were eligible for GNETS.

19 A. Mm-hmm (affirmative).

20 Q. Who -- I guess what students would be  
21 eligible for GNETS, based on their disability?

22 A. At least students ages five through 21, and  
23 I do see it says three, so we've got to correct that  
24 piece. But students ages five to 21 would be eligible  
25 to be served through our program.

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1 Q. Did you ever have students who were three or  
2 four participating?

3 A. No, never.

4 Q. Okay. During the time --

5 A. Even as a special ed director we never had  
6 students aged three participating.

7 Q. Okay. So it's your understanding the  
8 current age range is five through 21. And who sets  
9 that rule?

10 A. That came from State and that's in the State  
11 rule.

12 Q. And then in terms of the disability  
13 categories, or I should say diagnoses by which  
14 students can -- let me start that over.

15 For a student to be placed in GNETS what  
16 disability diagnosis do they have to have?

17 A. There is no specific diagnosis or  
18 eligibility area. Any student regardless of  
19 disability can be considered for GNETS as long as they  
20 meet the criteria that shows that they are having  
21 severe emotionality.

22 Q. Okay. And I just want to read here. So in  
23 this first paragraph -- I'm going to kind of skip a  
24 bit, but it says at the second sentence: We provide  
25 comprehensive educational therapeutic support services

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1 to students who otherwise might require residential or  
2 other more restrictive placements due to the severity  
3 of one or more of the characteristics category of  
4 emotional and behavioral disorders.

5 A. Mm-hmm (affirmative).

6 Q. For some students is that the basis for  
7 which they'd be placed in GNETS?

8 A. It is.

9 Q. And then it looks like the next paragraph  
10 says: Other eligible students with disabilities may  
11 be served in GNETS classes when the frequency,  
12 intensity and duration of their behaviors is such that  
13 this placement is deemed by those students' IEP teams  
14 to be appropriate to meet the students' needs.

15 What does that mean? Like who would fall  
16 into that?

17 A. So earlier we talked about students with  
18 autism and OHI. It would be those students. They are  
19 not necessarily identified with students with  
20 emotional behavior disorder, but in addition to the  
21 eligibility area that they have they are experiencing  
22 significant emotionality that might require them to be  
23 served in our program.

24 Q. Okay. And is that required by the State  
25 that you open the program to students who would meet

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1 that criteria?

2 A. Well, the requirement is is that you look at  
3 the continuum of services for all the students  
4 regardless of their disability.

5 So let's just say if I was a student who  
6 received speech services, if I needed services in  
7 other areas, I don't necessarily have to have an  
8 eligibility of specific learning disabilities or  
9 intellectual disabilities in order to get additional  
10 services.

11 Once I'm identified as a student with a  
12 disability, I'm eligible for services available to any  
13 student identified as a student with a disability.

14 Q. Okay. And I guess I just want to make sure  
15 I understand where this language comes from.

16 Did you-all make up this part about the  
17 frequency, intensity or duration, or do you know if  
18 that was required by the State?

19 A. Well, frequency, intensity and duration is  
20 part of that continuum we look at to determine that  
21 the child has a severe emotional and behavioral  
22 disorder.

23 Q. Okay. And I do understand that. I just  
24 want to make sure because I know you said this  
25 document was created before your time.

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1 A. Mm-hmm, mm-hmm (affirmative).

2 Q. I'm trying to figure out what things were  
3 required, what things essentially --

4 A. That's fine. I just want to make sure I'm  
5 answering correctly.

6 Q. No, no, I appreciate that.

7 And I do want to turn back to the GNETS rule  
8 because I believe there is some language there. And I  
9 want to make sure that the language here is  
10 consistent.

11 If you look at page 2 of Exhibit 82, which  
12 was the GNETS rule.

13 A. Mm-hmm (affirmative).

14 Q. In the first paragraph there is a sentence  
15 that starts with specifically "GNETS provides". And  
16 it goes on to say: Comprehensive educational and  
17 therapeutic support services to students who exhibit  
18 intense social, emotional and/or behavioral  
19 challenge --

20 A. Mm-hmm (affirmative).

21 Q. -- with a severity, frequency or duration  
22 such that the provision of education and related  
23 services in the general education environment has not  
24 enabled him or her to benefit based on the IEP.

25 A. Mm-hmm (affirmative).

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1 Q. Would you say that the eligibility criteria  
2 that you-all are using for Sand Hills in your  
3 Consideration of Services packet is consistent with  
4 the GNETS rule?

5 A. Yes.

6 MS. HAMILTON: So I'd like to turn to  
7 another document. GNETS related. I'm going to  
8 hand the court reporter what I'd like to be  
9 marked as 199.

10 (Plaintiff's Exhibit P-199 marked.)

11 BY MS. HAMILTON:

12 Q. This is Plaintiff's Exhibit 199 and this is  
13 a documented titled "Guiding Questions for  
14 Consideration of GNETS Services" that was produced by  
15 your program in response to our subpoena.

16 A. Mm-hmm (affirmative).

17 Q. And the first page of this document is  
18 stamped with the Sand Hills identifier 000361.

19 A. Mm-hmm (affirmative).

20 Q. Are you familiar with this document?

21 A. Yes.

22 Q. Okay. What is this document?

23 A. This is a guide, questions that we consider  
24 when we're looking at placing or recommending students  
25 for services through the program.



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1 Q. Okay. And how does this align with the  
2 document we were just talking about?

3 A. So when you say -- which document? We  
4 talked about two.

5 Q. Right. So how does the Guiding Questions  
6 document Exhibit 199 align with the Consideration of  
7 Services packet?

8 A. Well, it's going to go through and ask, you  
9 know, for them to submit information regarding the  
10 functional behavior assessment, behavior intervention  
11 plan. They have got to provide documentations on  
12 whether or not evidence-based interventions have been  
13 implemented and the outcome.

14 We look at the student's current placement.  
15 Also, what's currently in the student's IEP. And then  
16 the other part is making sure that we have a current  
17 evaluation on file for the student.

18 Q. Okay. And is this a document that was  
19 created by the State Department of Education?

20 A. I don't know that it was created by the  
21 State Department of Education, but I do know that it's  
22 a document that most of the GNETS programs kind of use  
23 to follow.

24 Q. Do you know who provided it to you-all?

25 A. I don't.

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1 Q. And I know at the top there is like a GNETS  
2 symbol here. Is this like the State Department of  
3 Ed's symbol for GNETS?

4 A. It is. It is.

5 Q. So is it reasonable to conclude that this is  
6 a document that the State would have provided you-all?

7 A. I probably wouldn't say that it's safe to  
8 conclude that because I take the symbol and put it on  
9 documents that I create, too, as part of showing that  
10 it's part of the forms or documents that I use for the  
11 program.

12 Q. Did you create this document?

13 A. I did not create the document, but this is  
14 our consideration of packet. And I've put that on  
15 there, and I'm pretty sure you have other documents  
16 where I may have added this form, which is why I said  
17 that I wouldn't just assume that this was created by  
18 GNETS because it's on there.

19 Q. But it's your understanding that GNETS is  
20 using this same --

21 A. Absolutely.

22 Q. -- identical form?

23 A. Mm-hmm (affirmative).

24 Q. Have you received any training on this form  
25 from the State Department of Ed then?

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1 A. Not from the State Department, no.

2 Q. Have you received training from anyone on  
3 it?

4 A. When I first came on board, the coordinators  
5 kind of walked me through the whole form, the process,  
6 and how we use that.

7 Q. And is it your understanding that the  
8 requirements here are consistent with the requirements  
9 in the GNETS rule for the consideration of services?

10 A. Yes. And I'm going to back up. And the  
11 GNETS director who was here before kind of walked me  
12 through this as well.

13 Q. Okay. Are you required to follow all of  
14 these steps before admitting the student into the  
15 GNETS program?

16 A. There is no requirement to use this, to use  
17 the form. It's just a good guide.

18 Q. Okay. Hence why it's called "Guiding  
19 Questions"?

20 A. Correct.

21 Q. All right. So I want to walk through a few  
22 of these. So question one says: "Is the student  
23 currently served in Special Education?"

24 Does a student have to be served in special  
25 education to be considered for GNETS?

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1 A. Yes.

2 Q. And is that a requirement that you-all set  
3 for Sand Hills, or is that a requirement from the  
4 State?

5 A. It's a requirement from the State.

6 Q. Okay. Question two: "Does this student  
7 have a Behavior Intervention Plan completed within the  
8 past year that is based upon an appropriate Functional  
9 Behavior Assessment?"

10 What is a Behavior Intervention Plan?

11 A. Based on the data that's collected through  
12 the Functional Behavior Assessment which identifies  
13 the interfering behavior for the student, the staff  
14 will develop a behavior intervention plan specific to  
15 that student's need to kind of address the behavioral  
16 problems that are going on with the student; collect  
17 data on that behavior intervention plan, and determine  
18 whether or not the plan that's in place is working.

19 If it's working, they'll continue the plan.  
20 If it's not working, they'll come back and make  
21 adjustments to the plan. And they may do that two,  
22 three times to four times.

23 And if it looks like even with all the  
24 adjustments and things that are put in place if that  
25 child is still failing to make progress, that may be a

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1 red flag that we probably -- or indicator that you  
2 need to go another step, which could include making  
3 the referral for considerations of GNETS.

4 Q. Okay. And I wrote -- so this is happening  
5 before the student is placed in GNETS; correct?

6 A. Yes, mm-hmm.

7 Q. Who's conducting the functional behavior  
8 assessment and creating this plan?

9 A. It would be the LEA that the student is  
10 participating in. And if they need assistance from  
11 us, we can definitely provide assistance as well.

12 Q. And then it also mentions here under this  
13 last bullet point under number 2, it says there is a  
14 comp -- "Has a comprehensive evaluation been completed  
15 within the past 3 years?"

16 Is this a psychological evaluation?

17 A. It is, mm-hmm (affirmative).

18 Q. What is that?

19 A. So it might not just be the psychological  
20 evaluation. It's all the information that's included  
21 in a psychological evaluation. It might be  
22 information on the hearing, vision, is that an  
23 indication of some things might be -- that might be  
24 going on. It's an IQ test. It's current student  
25 achievement assessments. It's parent rating scales,

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1 teacher rating scales. It's anecdotal observations.  
2 All of those things would be included in that  
3 comprehensive evaluation.

4 Q. In your experience, I guess, both as a GNETS  
5 director and also in your various roles with Richmond  
6 County as a Special Education director and  
7 coordinator, what happens if there is no behavior  
8 intervention plan that's in place?

9 A. That's a red flag or an indication that  
10 something probably needs to be put in place for that  
11 student, if we're sitting at the table at that level,  
12 then we need to put one in place.

13 Again, we're probably going to recommend  
14 that go back to the table, collect the data, see if  
15 you put interventions in place if that will address  
16 the needs of that student. And we would develop, help  
17 them develop a behavior intervention plan.

18 Q. Okay. And I guess, similarly, if there is  
19 doesn't a functional behavioral assessment, would that  
20 need to be conducted?

21 A. The preference is that you conduct the  
22 functional behavior assessment before you do the  
23 behavior intervention plan to make sure you're working  
24 on the right behavior.

25 Q. And is it your understanding that these

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1 steps are also required under the GNETS rule as well?

2 A. Yes.

3 Q. Question three says: "Have any  
4 Evidence-Base interventions been implemented with the  
5 student"?

6 A. Mm-hmm (affirmative).

7 Q. What are evidence-based interventions?

8 A. So it would be those types of interventions  
9 that they put in place that have evidence that showed  
10 they have been successful with other students who have  
11 similar behaviors.

12 And what would happen is they would bring  
13 that information to the table, say, hey, we tried A,  
14 B, C, and D, this didn't work. It might include  
15 something like we did check-in, check-out with the  
16 student to have the child check in every day with the  
17 preferred person and check out with the preferred --  
18 with a preferred personal, did that work for that  
19 student as one of the evidence-based interventions.

20 Q. And how would you know -- so one of the  
21 steps here says: Have these interventions been  
22 implemented with fidelity with the student?

23 A. Mm-hmm (affirmative).

24 Q. How would you know if -- or I should say how  
25 would -- yeah, how would you know if they have been

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1 implemented with fidelity?

2 A. So part of this packet requires them to  
3 submit that documentation. So they might have point  
4 sheets, they might have charts. They have data to  
5 show, you know, the dates they implemented it and also  
6 what the outcome was. So part of that would require  
7 them to submit that documentation.

8 Q. There is also a bullet point here that says  
9 underneath number 3: Have the interventions been  
10 implemented for a significant length of time --

11 A. Mm-hmm (affirmative).

12 Q. -- to demonstrate their effectiveness or  
13 lack thereof.

14 How do you determine a significant or what  
15 is considered a significant length of time?

16 A. My old hat would say 20 days and so I'm  
17 going to stick with 15 to 30 days of implementing an  
18 intervention, coming back and seeing if it worked,  
19 going back to maybe tweak it.

20 Q. And what is that based on when you say 15 to  
21 20 or 15 to 30?

22 A. Calendar days. That's when they started  
23 from the time they implemented the intervention, ten  
24 -- some people say ten days, some people say 15 days,  
25 some people say 20 days, of implementing that



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1 intervention with fidelity over a period of time,  
2 which, as I just said, those, and determining whether  
3 or not it's been successful, coming back to the table  
4 looking at that data after a certain point to  
5 determine whether or not the child is making progress  
6 or failing to make process.

7 So what you don't want to do is keep  
8 implementing the wrong intervention, so you want to  
9 come back to the table to see if it's making an impact  
10 for the student.

11 Q. Okay. But that time period is not a defined  
12 period --

13 A. It's not defined.

14 Q. -- from program to program?

15 A. Mm-hmm (affirmative). Right.

16 Q. Okay. And is it your understanding that the  
17 State would, like, along with these other steps, would  
18 expect you-all to consider whether evidence-based  
19 interventions have been implemented before admitting a  
20 student to GNETS?

21 A. Yes.

22 Q. Okay. And then for question number 4 it  
23 says: "What is/are the student's current placement  
24 and/or circumstances?"

25 A. Mm-hmm (affirmative).

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1 Q. And the first bullet point says: "Have all  
2 options on the special education continuum been  
3 considered and/or tried for this student?"

4 What are the options on the special  
5 education continuum being referenced here?

6 A. So we would probably be considering his  
7 least restrictive environment. You've got a child  
8 who's being served maybe on a consultative basis  
9 referring -- and consultative means maybe 15 minutes a  
10 week of direct services. It may not be appropriate to  
11 refer a child who's getting 15 minutes of consultative  
12 services referring them to GNETS at this point because  
13 they are having a hard time.

14 What we would want to see is that the school  
15 or the school system has exhausted the full continuum  
16 looking at consultative services, collaborative  
17 services, maybe if the child is doing co-teaching that  
18 they have gone through that continuum part-day  
19 services all the way up to full-day services and there  
20 is nothing else left at that site to try for that  
21 student. So we want to make sure they've exhausted  
22 all those options.

23 Q. Okay. And where does GNETS fall on that  
24 continuum exactly?

25 A. We're considered a full-day placement, and

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1 so we would fall after pull out all day long, and we  
2 were right for home-based and hospitalization.

3 Q. Right. And I just wanted to clarify. In  
4 terms of the student population that's served I think  
5 you have used the term "severe emotional" in referring  
6 to students and GNETS who are being considered for  
7 GNETS.

8 A. Mm-hmm (affirmative).

9 Q. How do you define that term?

10 A. Again, go back and look at the frequency and  
11 intensity and duration of the behaviors. It's not  
12 anything that's quantified, if I can use that term.  
13 The impact that the student -- when a child is in  
14 crisis, the impact of that crisis, how long does it  
15 take for the child to recover from a crisis, how much  
16 staff capacity is required to bring that child out of  
17 crisis.

18 So there are a lot of the different factors  
19 that we would consider when we're looking at  
20 identifying a child who's having significant or severe  
21 emotionality.

22 Q. And I guess how does that relate  
23 specifically to a disability diagnosis?

24 A. I'm not sure I understand the question fully  
25 when you say how does that relate to the disability

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1 diagnosis. Because you can have a student with a  
2 different diagnosis, but he's, I mean, a different  
3 eligibility. I don't want to say different -- with an  
4 eligibility who's also experiencing severe  
5 emotionality. It's -- I'm not sure. Can you explain  
6 that question?

7 Q. I think you may have answered it. I guess  
8 it sounds like you're saying it's not an actual  
9 disability diagnosis --

10 A. Mm-hmm (affirmative).

11 Q. -- itself.

12 A. It's --

13 MS. FLETCHER BOWDEN: What do you mean by  
14 it? Yeah, I'm not sure.

15 BY MS. HAMILTON:

16 Q. Just this term, the terminology of severe  
17 emotionality, severe or significant emotionality.  
18 Like that -- like EBD, we had discussed earlier --

19 A. Mm-hmm (affirmative).

20 Q. -- could be a disability diagnosis. But  
21 severe emotionality, that's not actually, like you  
22 wouldn't have a student who has a diagnosis of severe  
23 emotionality; is that correct?

24 A. We don't have that. Let me -- I really am  
25 not thinking I understand your question. So there is

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1 no -- there currently is no eligibility area for  
2 severe emotional and behavior disorder in the state of  
3 Georgia. Is that the -- is that what you're asking  
4 me? Is there eligibility area for SEBD, is that what  
5 you're asking me?

6 BY MS. HAMILTON:

7 Q. I might be talking you into circles. Okay.  
8 I think we'll move on from this line of questioning  
9 for now, might revisit later if it comes up in another  
10 context.

11 A. Okay.

12 Q. All right. So on the second page of  
13 Exhibit 199 underneath the first set of bullet points  
14 there is some language in italics, and it says: "Once  
15 all of these questions have been answered, the team  
16 needs to determine whether or not there is some areas  
17 that need to be addressed prior to moving forward with  
18 the most restrictive placement of GNETS."

19 And then it also says: An action plan needs  
20 to be developed in regards to the other considerations  
21 that might need to be addressed, or other placement  
22 options within the school may need to be attempted."

23 What does that action plan look like?

24 A. It could be part of the IEP where we're  
25 talking about, well, you know -- and I have actually

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1 sat in on some meetings where we've had to go back to  
2 the table and talk about those things that need to be  
3 put into place. It could be anything from the steps  
4 needed to conduct a functional behavior assessment and  
5 who would be responsible for doing that and the time  
6 frame for getting that completed, and for us coming  
7 back to the table to consider additional information.

8 It could be a plan that's developed on  
9 different types of interventions that we discussed  
10 that are evidence-based that could be implemented for  
11 a student.

12 It could be something as simple when you're  
13 talking about the child's current placement, or if the  
14 child needs more support, and he's only getting  
15 15 minutes of consultative services, you may only want  
16 to look at the additional pull out services for that  
17 child to address whatever areas they need and go  
18 through that continuum.

19 If the child's not had a psychological  
20 within three years it might be, hey, let's go and get  
21 the child evaluated to see what's going on with the  
22 student.

23 Q. And then this last section lists additional  
24 documentation. The first says -- and I guess, one, I  
25 should confirm are these things that are required by

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1 the GNETS rule?

2 A. Yes.

3 Q. Okay.

4 A. Students would have to have annual IEP  
5 meetings. I don't want to say just GNETS, but for  
6 students with disabilities period you would do annual  
7 review. You would do progress monitoring. That's in  
8 line with the IEPs. The last one is probably more  
9 GNETS directed.

10 Q. Okay. And part of the reason why I'm asking  
11 about GNETS is because I'm just trying to confirm if  
12 these are steps that have to be taken for a student to  
13 be placed.

14 A. That's correct.

15 Q. So these are things that are required by the  
16 State?

17 A. Mm-hmm, mm-hmm, yes.

18 Q. Okay. And for this last bullet point under  
19 that list of documents it says: Documentation  
20 indicating prior services were delivered in a less  
21 restrictive environment and the student's inability to  
22 receive FAPE in that environment.

23 A. Mm-hmm (affirmative).

24 Q. Who reviews the sufficiency of the services  
25 that had been provided in the student's home school?

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1 A. The IEP team. So it would be people from  
2 the home school, it would be people from the GNETS  
3 program. It could include outside agencies who have  
4 been invited to the meeting, as well as the parents.

5 Q. I'm going to circle back to that later.  
6 Okay. And is that a one-time discussion, or -- I  
7 guess I'm trying to get a sense of is there basically  
8 a determination made at that time during the IEP  
9 meeting that the services had been -- had -- that  
10 prior services had been delivered in a less  
11 restrictive environment, or that the student was  
12 unable to receive a FAPE?

13 A. We have that discussion during the meeting.

14 Q. Okay.

15 A. And we do go back and revisit it if we need  
16 to do that at a later time if we need to come back if  
17 somebody is missing something in one of those other  
18 areas, or any area that's discussed, we do come back  
19 to the table. So it's not like the answer is no and  
20 that's the end of it. If we need to come back, we  
21 will.

22 Q. Okay. So I want to tie this back in with  
23 the consideration of services document that we were  
24 talking about earlier. So if we can turn back to I  
25 believe it's Exhibit 198. And if we can turn to the



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1 checklist of items, the bottom of the page is stamped  
2 000352.

3 Are you familiar with the checklist on this  
4 page?

5 A. Yes.

6 Q. Okay. And what is your role in connection  
7 with the creation of this checklist?

8 A. Well, the creation of the checklist, it was  
9 already in place when I came on board. And I'm trying  
10 to see if I had input before. It was already on --  
11 this one was already created.

12 Q. Okay. And would you say that the mandatory  
13 items that are on this list are consistent with  
14 requirements in the GNETS rule?

15 A. Yes.

16 Q. So a few of these I want to ask some  
17 additional questions about that we haven't talked  
18 about already.

19 So this first box, checkbox says: Completed  
20 Consideration of Services Form (signed by Parent, Case  
21 Manager and Principal).

22 Who's filling out this packet or this form?

23 A. It would be a school-based form. We always  
24 want those people who would be providing input to be  
25 aware that this is being considered for the child,

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1 especially the parent, so they would be involved in  
2 that process as well.

3 Q. And by school base, is that someone from the  
4 LEA who's filling this out?

5 A. That's correct.

6 Q. And then the parent, the case manager or the  
7 principal sign?

8 A. Yes.

9 Q. Does anyone from the GNETS program sign?

10 A. No, they submit this to the GNETS.

11 Q. Okay. And then I think we talked about most  
12 of these other ones, but skipping down to the last  
13 item it says: "Parent Questionnaire."

14 What is that document?

15 A. We have a social history form that used to  
16 be in place. It's actually not implemented back, so  
17 let me see if we are using something else right now.

18 If you look at the back of 00358, that would  
19 be the information to get the developmental social  
20 history for the student.

21 Q. Okay. And who fills this one out?

22 A. The parent gives us the information. There  
23 are times we have had a social worker contact the  
24 parent to get the information.

25 But one of the things, as I think I

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1 mentioned earlier, is that we really want that input  
2 from the parent about what's going on. So we really  
3 try to make sure that we get that, if the parents  
4 can't come to a meeting that we have some contact with  
5 them about what was going on with the child prior to  
6 them coming to the program, or being consistent with  
7 the program.

8 MS. HAMILTON: Okay. I'm going to hand the  
9 court reporter what I'd like to have marked as  
10 Plaintiff's Exhibit 200.

11 (Plaintiff's Exhibit P-200 marked.)

12 BY MS. HAMILTON:

13 Q. All right. So I just handed you Plaintiff's  
14 Exhibit 200. It's a document titled GNETS  
15 Confidential Student Information Packet.

16 The first page of this document is actually  
17 Bates stamped -- or actually, it's not, but when we  
18 received it it was Bates stamped. It was a document  
19 we received from the State of Georgia, and it had a  
20 Bates stamp of GA00340482.

21 Have you ever seen this document before?

22 A. I have not seen this form specifically, but  
23 a lot of the information that's in here is information  
24 that's in the consideration packet.

25 Q. Okay. And so you would say that it is

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1 similar to the document that you-all are using?

2 A. Mm-hmm, yes.

3 Q. But you haven't been provided this document  
4 directly from the State?

5 A. No.

6 Q. Okay. So I would like to turn back to the  
7 Consideration of Services packet --

8 A. Mm-hmm (affirmative).

9 Q. -- Exhibit 198. And I'd like to turn back  
10 to the checklist that we were looking at within the  
11 packet, which was at 000352.

12 And on the next page 000353 it mentions:  
13 "Optional items, other agency assessments that may be  
14 contained in the student's folder."

15 A. Mm-hmm (affirmative).

16 Q. What is that in reference to?

17 A. If you had a child who might have been seen  
18 through an outside mental health evaluator, or  
19 information that they shared with us or shared with  
20 the school, if there was information or notes from --  
21 some people get, some students might get outside OT,  
22 PT, any agency outside of the school system that would  
23 be working with that student that's not included with  
24 the -- with this information.

25 Q. And then in this very last sentence it says:

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1 "The State Board of Education Rules require that  
2 documentation include prior extension of less  
3 restrictive services and data which indicate such  
4 services have not enabled the students to be  
5 successful or documentation why such services have not  
6 been offered."

7 Is this what we were discussing when we were  
8 looking at the guiding questions and talking about the  
9 least restrictive -- like, consideration of whether  
10 the students had received services in a less  
11 restrictive environment?

12 A. That's correct.

13 Q. And so that is something that's required by  
14 the State Board of Education rules?

15 A. Yes.

16 Q. So should a child be placed in GNETS if they  
17 have not completed the Consideration of Services  
18 packet and provided the information that's denoted  
19 here?

20 A. Not necessarily the packet, but the process  
21 that's included in the packet. You want to make sure  
22 that they have gone through that process.

23 Q. Okay.

24 A. That they have exhausted all resources, and  
25 received those interventions that could benefit them

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1 before placing them in our program, if those  
2 interventions have been unsuccessful.

3 Q. Okay. Are you bound by these steps in  
4 determining whether to admit students into the GNETS  
5 program?

6 A. Okay. I want to make sure: Steps in here,  
7 or steps in here, or steps in --

8 Q. The steps that we've walked through in the  
9 Consideration of Services packet, as well as the  
10 Guiding Questions.

11 A. If I had to pick one, I would say we are  
12 bound to those steps that are in those Guiding  
13 Questions that are aligned to what's in that state  
14 rule, we are bound to those.

15 Q. Are there any consequences for not following  
16 the admissions criteria that are set forth, the ones  
17 that are consistent with what's in the State rule?

18 A. When you say "consequences," can you define  
19 that?

20 Q. Sure. Does the State have any, like is  
21 there any penalty for putting a student in GNETS if  
22 you haven't followed those steps from the State?

23 A. Well, I have not experienced any, but I  
24 would imagine that if we weren't following the  
25 procedures we would have some compliance questions to

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1 answer and possibly corrective action plans that would  
2 have to be put in place. But to my knowledge, I don't  
3 know anybody who's received consequences for not  
4 following what's required.

5 Q. And is that something that the State even  
6 monitors? Like are -- does the State monitor whether  
7 these steps are followed when students are admitted?

8 A. I will tell you that they ask us for  
9 information regarding what steps we take. They do  
10 monitor the process for our strategic plan, and our  
11 strategic plan includes all of these pieces, so they  
12 do monitor that.

13 This year we moved away from the rotational  
14 model for coming to check information, to submitting  
15 that information annually. So this will be the first  
16 year that the strategic plan requirements will be in  
17 our consolidated grant on the website for us to turn  
18 that in annually.

19 Q. And just to make sure I understand. So to  
20 the extent that the strategic plan has to be included  
21 in what you submit, does it influence whether you get  
22 funding or not?

23 A. Well, if they read the plan and if the plan  
24 doesn't meet criteria, they don't approve your budget.  
25 And they give you feedback on, you know, what you need

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1 to do to provide the supporting information; like you  
2 have to have documents that support that you're  
3 providing therapeutic services for students and what  
4 they look like; you have to provide documentation that  
5 shows that you're communicating and collaborating with  
6 the LEA.

7 All of those six areas under the strategic  
8 plan have to be -- there has to be documentation  
9 submitted with that area to show that you're meeting  
10 that area for compliance.

11 Q. So returning back to the checklist, would it  
12 surprise you to know that some of the Consideration of  
13 Services Form that we received from the program did  
14 not have all of these items that are checked here that  
15 are listed as mandatory?

16 A. It wouldn't surprise me, no.

17 Q. It would, or would not?

18 A. Would not.

19 Q. Okay. So, for example, if some of the  
20 records we reviewed did not have IEP benchmark  
21 assessment checked, or the Tier III data documenting  
22 behaviors checked, that wouldn't surprise you?

23 A. No.

24 Q. Okay. And another one didn't have -- let's  
25 see -- the checkbox that says documentation of



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1 severity of behavior checked? So why is that when you  
2 say it wouldn't surprise you that that's the case?

3 A. At the time they submitted the packet they  
4 might not have had those items available.

5 If there were items missing, then the team  
6 would probably go back and request that information  
7 prior to making a decision, or they could have pulled  
8 it at the meeting to have available there.

9 Because we do check these items, and if  
10 there are things that are missing, we do go back and  
11 contact the LEA.

12 Q. So it's your expectation that all of these  
13 should be completed, even if the form isn't filled  
14 out?

15 A. There might be some things that they may not  
16 be able to get like an immunization record. We might  
17 not have that at the time we do eligibility, but that  
18 wouldn't stop -- not eligibility -- but complete the  
19 considerations. But the immunization wouldn't  
20 necessarily keep us from saying whether or not a child  
21 needed our support.

22 So even though we ask for these things to  
23 the best of our ability, since they're not all  
24 required components, if there was something that we  
25 didn't have to have to consider for eligibility -- I

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1 mean, excuse me, considerations, then we might say  
2 well, just get the information back to us; like,  
3 immunization record, or copy of the birth certificate,  
4 because they probably have that at the child's school  
5 in their permanent record.

6 Q. So something like the IEP benchmark  
7 assessments, which is required, is that something that  
8 you would want to have evidence of --

9 A. Yes.

10 Q. -- if it's not checked off here --

11 A. Yes.

12 Q. -- before you would have a student admitted?

13 A. Mm-hmm (affirmative).

14 Q. And when this Consideration of Services  
15 packet as a whole comes to your office, who is the  
16 first person who receives it and looks at it?

17 A. The first person who received it is probably  
18 going to be the person working in the office, it's  
19 probably where they're going to leave it. The person  
20 who reviews it is probably the going to be the special  
21 education coordinator -- excuse me -- the GNETS  
22 coordinator.

23 MS. HAMILTON: Let me hand the court  
24 reporter what I'd like to have marked as  
25 Plaintiff's Exhibit 201.

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1 (Plaintiff's Exhibit P-201 marked.)

2 BY MS. HAMILTON:

3 Q. I'm also handing you Plaintiff's  
4 Exhibit 201. And this is a document titled "GNETS  
5 Services Flow Chart."

6 A. Mm-hmm (affirmative).

7 Q. That was produced by your program in  
8 response to your subpoena. And at the bottom of this  
9 document it's stamped with the Sand Hills identifier  
10 000360.

11 Are you familiar with this document?

12 A. Yes.

13 Q. What is it?

14 A. Again, it's a guide on the process that we  
15 would take when we're considering students for the  
16 continuing services through GNETS.

17 Q. Who did you receive this document from?

18 A. This was one of those documents that was  
19 already in place, and I've seen this one on some other  
20 GNETS websites. I'm not sure who created the form.

21 Q. If it's on the GNETS website, do you mean  
22 the Georgia, like the Georgia Department of Education  
23 GNETS website?

24 A. I'm sorry. Other GNETS programs' websites.

25 Q. So other GNETS programs have been using it?

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1 A. Yes.

2 Q. Do you know if it was created by the State  
3 Department of Education?

4 A. I don't know who created it.

5 Q. But you do know other GNETS programs have  
6 been using it?

7 A. Yes.

8 Q. And do you-all currently use it?

9 A. We use it as a guide. It's on our website  
10 for people who are interested in what the process  
11 looks like, they can go in and access it as well.

12 Q. So if you look at the middle of the page  
13 there is a flowchart that says standard process.

14 We were just walking through the standard  
15 process; correct?

16 A. Mm-hmm (affirmative).

17 Q. So I think the step that we were talking  
18 through, the SPED director would have determined the  
19 behavior problem -- whether the behavior problems meet  
20 the frequency, duration and intensity qualifications,  
21 all school steps would have been taken.

22 And so is it the Special Education director  
23 who determines those steps before submitting the  
24 packet to the program?

25 A. Prior to last year it was not. Last year --

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1 now, in the Thomson site with the satellite center it  
2 was; in the Richmond site for FY '22 it became the  
3 process.

4 So the packets go through the Special Ed  
5 department to make sure that all those items that we  
6 were recommending are in there. They review the data  
7 before they submit it to us to make sure all that has  
8 been done, the functional behavior assessment, the  
9 behavior intervention plan, the data, they review all  
10 of that before it gets to us.

11 Q. Okay.

12 A. So that's something that's different.

13 Q. Okay. So then once those steps have been  
14 taken, it says the next step is a student information  
15 packet is completed.

16 A. Mm-hmm (affirmative).

17 Q. What does that entail?

18 A. That's this. (Indicating document.) And  
19 all of the documents that go along with that.

20 Q. Okay.

21 A. They turn in the whole packet.

22 Q. Can you just describe since she can't see?

23 A. I'm sorry. It's the Consideration of  
24 Services packet along with all of the supporting  
25 documents that's turned in.

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1 Q. Okay. So once the Consideration of Services  
2 packet and related documents have been turned in it  
3 says the next step is the GNETS coordinator and the  
4 Special Education director meet to discuss the packet  
5 information; is that correct?

6 A. That's correct.

7 Q. Okay. What does that meeting entail?

8 A. So basically -- and usually if there is no  
9 discussion it might be something as simple as us going  
10 in and get our calendars together to find out what we  
11 need to do to schedule the meeting, or it could be,  
12 you know, that I received your packet and I see you're  
13 missing a functional behavior assessment, I see you're  
14 missing a behavior intervention plan. Is that  
15 something that you're going to have available before  
16 we schedule the meeting?

17 And so they really go through those items  
18 that are needed for that meeting that they want to  
19 schedule to discuss the consideration of services.

20 Q. Okay. And when you say their meeting to  
21 discuss the meeting, what's the other meeting you're  
22 referring to?

23 A. The actual IEP meeting. So when they meet,  
24 they are meeting to review the information that's  
25 required in the packet, and to schedule the upcoming

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1 meeting for the committee to meet to determine whether  
2 or not the child needs to be placed in a program or  
3 considered for additional services and supports  
4 through GNETS.

5 Q. Okay. So for this step, the meeting with  
6 the GNETS coordinator and the Special Education  
7 director, is there anyone else participating in that  
8 meeting?

9 A. Typically it's not. Sometimes some of the  
10 directors I know in the Thomson site, they might have  
11 their coordinator do the meeting -- actually in the  
12 Richmond, too -- they might have the coordinator do  
13 the meeting with the GNETS coordinator to talk about  
14 what's needed and to schedule that meeting.

15 Q. And when you say "coordinator," are you  
16 referring to the special education coordinator?

17 A. Correct.

18 Q. In lieu of the Special Education director?

19 A. Correct.

20 Q. And then for the GNETS coordinator  
21 participating, are they always the person who  
22 participates on behalf of GNETS, or can anyone else be  
23 designated for that role?

24 A. For this role specifically it would be  
25 either the GNETS liaison could do that, it could be

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1 the GNETS director could do that, or coordinator.

2 Q. So you participated in some of these  
3 meetings?

4 A. I have, yes.

5 Q. What are the possible outcomes that might  
6 come out of this meeting between you or the GNETS  
7 coordinator and the Special Education director?

8 A. So there are no outcomes other than if we're  
9 missing something or we need clarification, we would  
10 discuss that during that meeting. We don't make any  
11 determinations on whether or not the child is going to  
12 be placed in the program or considered for services.  
13 It's just what do we need to move forward to schedule  
14 that meeting. That's basically what we do.

15 Q. Okay. The next step says: "A 'School  
16 History' is completed with the student's teacher(s).  
17 And optional observation may be completed."

18 What does this step entail?

19 A. So for some of the students, I think I  
20 mentioned earlier, we actually go on site and do  
21 observations where that child -- actually, I want to  
22 say for the past two years before a child is placed or  
23 considered -- even if they're not placed -- we go on  
24 site and do observations in the child's school setting  
25 looking at how they implement the interventions,



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1 what's the setup of the classroom, what's the dynamic  
2 between the teacher and the student and the staff, and  
3 just getting an idea about who the student is before  
4 we come to the table because we don't get to see the  
5 students all the time.

6 So doing those observations help us too.

7 Q. And --

8 A. And it's going on site to conduct those  
9 observations.

10 Q. Okay. And who on your staff conducts those  
11 observations?

12 A. It might be the GNETS coordinator. It might  
13 be the GNETS liaison.

14 Q. Do you ever conduct any of those  
15 observations?

16 A. I have not as a GNETS director, or as a  
17 special -- well, as a special ed director I probably  
18 have gone out and done observations.

19 Q. So when the GNETS coordinator or the GNETS  
20 liaison participates in the observations, what are  
21 they trying to get out of conducting that observation?

22 A. Get a feel of who the child is, what's going  
23 on, what's the dynamics of the class when they are in  
24 there. Because sometimes we have the consideration  
25 packets come in and the child may not necessarily be

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1 considered for services, but we can provide  
2 recommendations on things that we've seen in those  
3 settings.

4 Q. The next step says the "school schedules an  
5 IEP meeting and GNETS is considered as an option."

6 A. Mm-hmm (affirmative).

7 Q. Do you or anyone else -- well, I guess,  
8 number one, do you participate in this process for a  
9 student who's referred to GNETS?

10 A. Not as a routine, I don't do that. The  
11 GNETS coordinators typically participate in those  
12 meetings. If for whatever reason a coordinator  
13 couldn't be there, or the liaison couldn't be there,  
14 then I would step in.

15 Q. How frequently does that happen?

16 A. With COVID, more frequently than not. But  
17 we haven't had a lot of referrals this year, so I'm  
18 going to say this past year I have only had to do it  
19 once in Richmond, and I haven't had to do any in  
20 Thomson.

21 Q. Okay. And that's out of how many referrals  
22 this past school year?

23 A. We have not had many referrals at all. In  
24 Richmond we have had three referrals. In Thomson we  
25 probably had a few more. And I'm really stretching

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1 when I say five referrals in Thomson. But that's not  
2 typical. That's just what's happened as a result of  
3 COVID.

4 Q. And so prior to COVID typically how many  
5 referrals would each site have?

6 A. And I can't answer that because I wasn't --

7 Q. That was before your time?

8 A. Mm-hmm (affirmative). But I would -- I  
9 would say that the numbers were higher, so I would say  
10 that the calculation for the number of referrals was  
11 higher as well.

12 Q. Okay. And do you know roughly when you were  
13 serving in your role as a Special Education director  
14 how many students you were referring to GNETS?

15 A. We might have referred ten to 15 a year,  
16 mm-hmm.

17 Q. Between both programs?

18 A. Well, I only worked with Richmond County.

19 Q. Oh, okay.

20 A. So that's between Richmond County and GNETS.

21 Q. And do you recall did you participate in any  
22 IEP meetings?

23 A. Even if I didn't participate in them, I got  
24 followup after the meeting, so. There might have been  
25 a few that I participated in depending on the nature

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1 of what was going on with that particular student.

2 Q. Okay. Okay. So I guess going back to my  
3 other original question, though, there is someone on  
4 the GNETS staff who participates in the IEP meeting,  
5 and you will participate if either the coordinator or  
6 the liaison -- well, I think you said if the  
7 coordinator is unavailable?

8 A. Mm-hmm (affirmative). And the liaison.

9 Q. And the liaison. And this is the same  
10 coordinator who would have met with the Special  
11 Education director to discuss the packet information?

12 A. Yes.

13 Q. Does an admission to the Sand Hills program  
14 depend on your approval before a student's enrolled?

15 A. My approval as a GNETS director?

16 Q. As a director?

17 A. Absolutely not. It's an IEP decision.

18 Q. So once the IEP team has met and made a  
19 decision, would you have any additional ability to  
20 approve or not approve a decision?

21 A. I -- no, I wouldn't approve or disapprove.  
22 The IEP team made the recommendation, we would move  
23 forward.

24 Q. Has there ever been a scenario where the IEP  
25 team has determined that a placement in GNETS was

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1 appropriate, but you or others on your program did not  
2 feel a student should be placed in your program?

3 A. Not to my knowledge since I have been here.

4 Q. So every student who's has been referred  
5 through the IEP team process has been admitted?

6 A. No. Every student who's referred is not  
7 admitted.

8 Q. Okay.

9 A. Because the IEP team could determine that  
10 the placement's not appropriate for the student. So  
11 we have had meetings where we didn't -- the child  
12 didn't come to us.

13 Q. Okay. So I should clarify. For every  
14 student who's referred, the IEP team determines the  
15 appropriate -- the placement is appropriate, have all  
16 of those students subsequently been admitted?

17 A. Since I have been here, the answer is yes,  
18 they have been.

19 Q. Would there ever be a situation where the  
20 IEP team determines the placement is appropriate but  
21 for various, for whatever reason, you-all determine  
22 that the student should not be in your program?

23 A. No.

24 Q. Can a parent or guardian unilaterally  
25 decline GNETS services?

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1 A. Well, a parent can decline any -- yes.

2 Q. Has an IEP team --

3 (Witness conferring with Ms. Bowden.)

4 THE WITNESS: I'm ready. I'm sorry.

5 THE VIDEOGRAPHER: And just because there  
6 was a slight pause, I apologize --

7 (Comments off the record.)

8 BY MS. HAMILTON:

9 Q. Have there been IEP meetings where the team  
10 has determined that a child should not be placed in  
11 GNETS because there are less restrictive environments  
12 for that student to be served?

13 A. Yes.

14 Q. How frequently -- well, I guess, roughly,  
15 how frequently does that happen?

16 A. So this is going to predate when I came on  
17 board because we really haven't had a lot of referral  
18 meetings since I came on board. But there were quite  
19 a few times I remember as a special ed director that,  
20 you know, it was like let's try them in a different  
21 program.

22 In Richmond County we had programs for  
23 students with autism, or the child may have needed to  
24 be served in a pull out day program all day long,  
25 or -- so the decision would be made for that, and, so

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1 yes, there are times that that happens.

2 Q. When you have participated in these meetings  
3 in your capacity as a GNETS director, what's your role  
4 during the meeting?

5 A. I serve as the LEA -- excuse me -- the GNETS  
6 representative providing input or making sure that we  
7 go through the different documents, provide  
8 recommendations, kind of facilitate the meeting to  
9 make sure that we're covering all those areas.

10 Q. In your capacity as the GNETS director  
11 participating in the IEP team meetings --

12 A. Mm-hmm (affirmative).

13 Q. -- if you had concerns that a student should  
14 not be placed in GNETS could you express that during  
15 the meeting?

16 A. Absolutely. Because I'm a member of that  
17 team just like anybody else could.

18 Q. Are there any other steps to the standard  
19 process that aren't listed here that you-all follow?

20 A. Other than the steps that are listed, the  
21 information that's listed here to include that piece,  
22 no, there are not any additional steps.

23 Q. Okay. And I do want to ask you about some  
24 other parts of this flowchart. So there is another  
25 part of the flowchart that says "Move In." Can you

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1 explain to me what this column represents?

2 A. Transfer students who come from another  
3 GNETS program or similar program.

4 Q. So would this include transfer students from  
5 other parts of the State of Georgia?

6 A. Yes.

7 Q. Would this include transfer students from  
8 other states?

9 A. Yes.

10 Q. Okay. And then it looks like it says here,  
11 it also includes students released from a long-term  
12 hospitalization or residential treatment; is that  
13 correct?

14 A. Yes.

15 Q. Have you ever enrolled anyone in the GNETS  
16 program from -- and I'm just quoting the language  
17 here -- a "similar program in another state"?

18 A. Yes.

19 Q. Okay. What would be considered a similar  
20 program from another state?

21 A. Typically what happens is when a student  
22 transfers into a school or school system and they  
23 share that their child -- the parents share that their  
24 child was receiving specialized services, based on  
25 what they say, the receiving school system does some



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1 research prior to even them coming to us and say, hey,  
2 we've looked at this child's information, and it looks  
3 like they were served in a program that's similar to  
4 GNETS. We'll go ahead and request the information,  
5 send that to you-all, and you-all can review it.

6 So the receiving school systems sends us the  
7 information. We review it. We contact the program  
8 that the child was being served in. We might go to  
9 the website to look to see what types of services they  
10 were providing, look at the child's IEP, ask for the  
11 information, some of the information that's similar to  
12 what we're asking for in the packet, and have the team  
13 convene and talk about the students.

14 And we really want the parents at these  
15 meetings for their input so they can give us that  
16 background information about what was going on with  
17 the child, because at that point we have them to rely  
18 on for that information.

19 The team would make a determination on  
20 whether or not the consideration of services in GNETS  
21 would be appropriate for that student.

22 Q. Okay. And just to make sure I understand  
23 also what is -- what's meant when it says long-term  
24 hospitalization or residential treatment?

25 A. We have a student that that applies to, and

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1 the process is very similar. We had a student who  
2 transferred in within the last two-and-a-half years to  
3 the Thomson site. And the only place the child had  
4 been served -- she came from Pennsylvania -- the only  
5 place that she had been served in from the time she  
6 was in middle school to high school was in a  
7 residential placement.

8 The school system, of course, took the  
9 child's information, enrolled her in school, and  
10 immediately made the GNETS referral.

11 We contacted the hospital that the child was  
12 placed in, had the parent participate in the meeting.  
13 And I want to say we were able to get some people from  
14 the hospital at that meeting as well, or they sent us  
15 some information. And we were able to determine that  
16 the child -- the team made the determination that the  
17 child should be considered for services in the GNETS  
18 program. And so we did serve her last year.

19 Q. And are these students who have been  
20 hospitalized or residential treatment based upon  
21 behavioral health or psychiatric needs, or could there  
22 be other reasons that they would have been  
23 hospitalized that they would come to GNETS?

24 A. I haven't seen any other reasons. Typically  
25 it's mental health. It's student in crisis. I'm

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1 going to even just say it's behavioral, just that  
2 they're in crisis and had some type of mental health  
3 need.

4 Q. And when the students are enrolled, do they  
5 immediately -- like if a student transfers to your  
6 area or is released from hospitalization or  
7 residential treatment, do they automatically start  
8 school in the GNETS program, or do they start in the  
9 LEA until this process is completed?

10 A. They start in the LEA. So there is no  
11 automatic placement. They have to still show that  
12 they need the services.

13 Q. Okay. And then, lastly, I want to turn to  
14 this consultation section. This is kind of like the  
15 precursor of everything we've been talking about.

16 A. Mm-hmm (affirmative).

17 Q. Can you -- I know you've talked about this  
18 in passing as we've been talking about the process for  
19 referrals, but what exactly is meant by the term  
20 consultation?

21 A. Consultation is a term that we use when  
22 we're providing support to the different LEAs. So if  
23 we had a LEA who might contact our program, say, hey,  
24 I have got a couple of teachers who need some support  
25 on conducting a functional behavior assessment, or do

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1 you have anybody who can conduct a functional behavior  
2 assessment to help us develop behavior intervention  
3 plan, we would go on site to do that.

4 Sometimes they just might want us to come  
5 out, hey, can you come out and do some observations on  
6 a student and give us some recommendations on some  
7 things that we can put in place for the student.

8 Sometimes they might call us and ask do we  
9 have information regarding resources that might be  
10 available for a student, or can we look at data that's  
11 been collected, can you -- what's this showing?

12 But basically it's that support. And not  
13 necessarily looking for placement or services. They  
14 are just looking for some additional support and  
15 expertise for staff for working in the GNETS program.

16 Q. Okay. And I think you mentioned this  
17 earlier, but who in your staff is providing these  
18 services directly to the school districts?

19 A. It could be the -- oh, and the other thing  
20 is professional learning, too. We do a lot of  
21 professional learning. It could be the GNETS liaison,  
22 it could be the coordinator, it could be the director  
23 providing those services. And sometimes we'd use our  
24 counselor to go out and do some of those things as  
25 well.

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1 Q. Okay. So walking through each of the ones  
2 that are listed here, FBA coaching, who would  
3 typically be the person on your staff who would  
4 provide that support?

5 A. The liaison and the coordinators and  
6 director.

7 Q. And last school year approximately how many  
8 times was your program requested to provide FBA  
9 coaching?

10 A. None.

11 Q. None?

12 A. No.

13 Q. And prior school years, roughly how many  
14 times would your GNETS program have been contacted for  
15 that service?

16 A. So I can say that in the Thomson site for  
17 the FBA piece, we had one -- two directors contact us  
18 about doing some FBA coaching and behavior  
19 intervention plan development.

20 Q. And for Richmond?

21 A. Not so much with the FBA and behavior  
22 intervention plan. We had more requests for  
23 professional learning through MindSet, and we did the  
24 training for -- and my years are going to run  
25 together. So it could be -- we did the MindSet

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1 training for all of those schools that were  
2 considered required technical assistance, and behavior  
3 was one of those areas, we did MindSet training for  
4 all of them. That might have been ten schools that we  
5 went out and provided support for. And that's FY --  
6 not '21-'22, but '20-'21.

7 Q. And then for direct consultation, who from  
8 your staff provides those services?

9 A. That could be the GNETS liaison or the  
10 coordinator.

11 Q. Last school year how many times did you  
12 receive a request for a direct consultation?

13 A. Let's see. I don't know that we received  
14 any last year because schools were out so much other  
15 than we did receive a couple of requests for  
16 observations in the Thomson site. And I want to say  
17 it wasn't more than three between the two sites.

18 Q. And did any of those students ultimately end  
19 up coming to GNETS?

20 A. No, not from the year, not last year, no.

21 Q. And do you know why that would be?

22 A. The student could have moved. I know one  
23 particular situation. I'm not sure if it was  
24 something going on in that school system between the  
25 parent and the system; and that, we just never moved

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1 forward with anything else, and they never reached  
2 back out to us.

3 Q. And for the other students do you know why  
4 they did not end up going to GNETS? For example, did  
5 you-all determine or, I guess, through the  
6 consultation process?

7 A. Well, one thing that they decided is that  
8 they were going to go through the behavioral support  
9 class before they referred them on to us.

10 Q. And then for Indirect Consultation, who  
11 typically provides that service?

12 A. It could be the GNETS liaison, it could be  
13 the director, it could be the coordinator. And with  
14 that it might be, Hey, can you look at this child's  
15 record? Typically it's with transfer students. Can  
16 you look at this child's record to see if this might  
17 be a student who would be eligible for your program?

18 If they are not coming straight from a GNETS  
19 program, maybe they are coming from out of state.  
20 They might ask us to look at that. If there are some  
21 questions regarding what the data is showing for the  
22 behavior intervention plan, or from the IEP they might  
23 look at that and ask us for recommendations as well.

24 Q. And how many requests for indirect  
25 consultation did you receive?

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1 A. Oh, those came through email. So I'm going  
2 to say this year I think I have gotten three. And  
3 those did come straight to me for the Richmond site.  
4 Thomson, she may have gotten two -- and these are  
5 really rough numbers.

6 Q. That's fine.

7 A. She may have gotten two. And these are  
8 really rough numbers.

9 Q. That's fine.

10 A. She may have gotten two. That one is very  
11 informal.

12 Q. And how has that compared to prior years?

13 A. I can't answer that. I don't know.

14 Q. Okay. Until for last year the requests that  
15 you did receive, did any of those students end up  
16 coming to your GNETS program?

17 A. Actually, they didn't. They just didn't  
18 move to the area for the ones that I'm thinking about.  
19 These numbers -- I think I said they were primarily  
20 transferred in. They just didn't move to the area.

21 MS. HAMILTON: All right. I'm going to hand  
22 the court reporter what I'd like to have marked  
23 as Plaintiff's Exhibit 202.

24 (Plaintiff's Exhibit P-202 marked.)

25 BY MS. HAMILTON:



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1 Q. You just received Plaintiff's Exhibit 202.  
2 And it's a document entitled GNETS request for GNETS  
3 -- sorry -- Request for GNETS Consultation. And this  
4 was a document we had received in the state of  
5 Georgia's production with a Bates stamp of GA00340477.

6 Have you ever seen this document before?

7 A. Yes, I think this was a document that we  
8 actually used as well.

9 Q. Okay. And how do you-all use this document?

10 A. It's actually on our website, and we've kind  
11 of tweaked it a little bit. Because one of those  
12 things is that we want to maintain when these are  
13 coming in. So we have somebody who monitors the form  
14 when it comes in so that schools can fill it out to  
15 request specific support that they might want from  
16 somebody on our staff.

17 Q. And do you know where your program  
18 originally got this document from?

19 A. No.

20 Q. So you don't know if it was a document you  
21 received from the State?

22 A. No. It was already here. I think it's a --  
23 I don't know.

24 Q. Is it a document that other GNETS programs  
25 are using as well?

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1 A. Yes.

2 Q. And the last thing I want to talk about on  
3 this topic, I wanted to circle back, you had mentioned  
4 earlier on these behavior support classes in Richmond,  
5 in Richmond County in the school district.

6 A. Mm-hmm (affirmative).

7 Q. And that you said that in many ways those  
8 classes have almost -- it sounds like it's a process  
9 that either complements or supplements the referral  
10 process?

11 A. Mm-hmm (affirmative).

12 Q. Can you speak more to that?

13 A. So as a special education director from  
14 Richmond County and becoming the GNETS director part  
15 of the discussion was we had these students who were  
16 being served out in the school system who needed a  
17 little bit more.

18 The State of Georgia changed the criteria  
19 for serving students, or teachers serving students, so  
20 we didn't have a lot of staff who received specialized  
21 training in emotional behavior disorder. We didn't  
22 have staff who received specialized training in  
23 working with students with intellectual disabilities,  
24 or specific learning disabilities. Those used to be  
25 specific areas that teachers had certifications in.

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1 So now their certification's like general, unless  
2 you're teaching students with significant cognitive  
3 disabilities. So everybody has -- primarily has  
4 either special ed general curriculum, special ed  
5 adaptive curriculum, or they might have both.

6 And so one of the things that happened is as  
7 we started looking at developing programs we  
8 identified that there was a need to have something for  
9 a select group of kids who are experiencing some  
10 emotional or behavioral difficulties that couldn't  
11 always be addressed successfully in a traditional  
12 special education class.

13 As a result, they -- Richmond County got  
14 approval to do these behavior support classes. They  
15 have got two elementary classes, two middle school  
16 classes. I think there were two high school classes,  
17 but there may just be one now. I'm not really sure.  
18 But they have a minimum of five behavior support  
19 classes.

20 So the consideration process for students  
21 being placed in those classes is very similar to  
22 the -- or I should say have some similarities to how  
23 students are placed in GNETS: Have you exhausted all  
24 of your resources at that school level for that  
25 student before we're going to look at moving that

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1 child out and placing them in another school. And so  
2 they follow that same process.

3 The number of students the first year was  
4 very low. Last year we had an increase in the number  
5 of students who were placed there. So they do have  
6 some students they have worked with over the course of  
7 the year. Out of those students who were in the  
8 program last year there was a recommendation for two  
9 students to be considered for GNETS. One of those  
10 students will start next year, the other one is -- may  
11 be coming up. I'm not sure what they decided.

12 And that was a way to make sure that all  
13 resources that were available at the school level were  
14 being exhausted before they considered placing the  
15 students, or having the students considered for GNETS  
16 if that's what they needed.

17 Q. And the students who are in these classes,  
18 are these all students who have -- who would meet the  
19 eligibility criteria of going to GNETS in terms of  
20 their disability diagnosis?

21 A. If they didn't make progress, yes.

22 Q. And in this program are they provided with  
23 therapeutic services and supports?

24 A. I can't testify to the amount that they are  
25 provided. I'm pretty sure that we provide more

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1 therapeutic services and support, so there would be no  
2 reason to refer them to us.

3 They do have access to some -- to  
4 therapeutic services. Most of our schools have social  
5 workers. They have counselors on site. They are not  
6 on site every day like our social workers and  
7 counselors are. They may have access to a behavior  
8 support specialist. So they have access to some  
9 services, but it's not the same level that they would  
10 get if they were in a GNETS program.

11 Q. For the two students who ultimately were  
12 recommended for placement in GNETS, was there anything  
13 unique about their circumstances that you felt  
14 necessitated them being put in GNETS?

15 A. Well, for the one that we've met on already,  
16 that particular student they were able to document  
17 that they had provided a number of supports and  
18 interventions. They worked with the student in a  
19 school-based program, went through that whole process  
20 at the school-based level. Then they placed the child  
21 in a -- the behavior support class, worked with the  
22 child at that level, and the student continued to have  
23 difficulties.

24 And I think it was like in -- they submitted  
25 the referral in April or May for that student. And so

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1 we were able to as a team determine that consideration  
2 in GNETS would be appropriate at this time because  
3 they had exhausted all of the options and  
4 interventions at their level.

5 Q. And is that true for the other student as  
6 well?

7 A. We haven't met on that student yet.

8 Q. Oh, you haven't met on that student.

9 A. Huh-uh.

10 Q. And I guess just one other clarification on  
11 how this works, and, again, I realize that's for the  
12 school district, are those two students totally  
13 separate from all other general education students, or  
14 do they have other opportunities for integration?

15 A. They, I want to say they have other  
16 opportunities for integration. They are located --  
17 two of them are located in -- one in South Augusta  
18 Elementary School, one in I'm going to say West  
19 Augusta Elementary School, one South Augusta Middle  
20 School, one South Augusta -- West Augusta Middle  
21 School, and then the high school class is in East  
22 Augusta. So they are housed in school, so they have  
23 opportunities to participate.

24 Q. And I know you said they have opportunities.  
25 Do you know if they do participate?

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1           A.     I don't. Well, I know about the other  
2 student. I think he did have the opportunity to  
3 participate in a Connections class, and it didn't go  
4 so well for him. But he had opportunities to.

5           Q.     Okay.

6           MS. HAMILTON: Is this a good time for a  
7 break?

8           MS. BOWDEN: I think so, yeah, that would be  
9 a good time for a break.

10          THE VIDEOGRAPHER: Excuse me. Off the  
11 record at 1 -- excuse me, 3:11 p.m.

12          (Recess 3:11 p.m. - 3:29 p.m.)

13          THE VIDEOGRAPHER: All right. We are back  
14 on the record at 3:29 p.m.

15 BY MS. HAMILTON:

16          Q.     Ms. Newsome, I'm going to hand the court  
17 reporter what I'd like to have marked as Plaintiff's  
18 Exhibit 203.

19          (Plaintiff's Exhibit P-203 marked.)

20 BY MS. HAMILTON:

21          Q.     So this document Plaintiff's Exhibit 203 is  
22 a document titled Sand Hills Level System that was  
23 produced by the Sand Hills program in response to the  
24 United States subpoena.

25                 The first page of this document is stamped

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1 using the Sand Hills identifier of 000363. Are you  
2 familiar with this document?

3 A. I am.

4 Q. Okay. What it it?

5 A. This is our level system, and it shows how  
6 students move up through the program, and how they  
7 earn rewards, and some different types of behaviors  
8 that if they engage in, and then consequences of those  
9 behaviors.

10 Q. How long has the program used this document?

11 A. I'm not sure. But I can say they have been  
12 using it for the past two-and-a-half years at a  
13 minimum.

14 Q. And since you've been there have you been  
15 involved in making any changes to the level system?

16 A. We're actually in the process of tweaking it  
17 now, and there should be -- if we're making, going to  
18 make any changes it would be done by the end of next  
19 week.

20 Q. Okay. What changes do you anticipate  
21 making?

22 A. I'm not sure yet. That's what I'm going to  
23 get from the admin team who reviewed all the documents  
24 over the summer. They finished reviewing it last  
25 week, and we have a meeting scheduled this week to



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1 make those changes.

2 Q. And when you say "admin team," who would  
3 that include?

4 A. That would be the social worker, the  
5 counselor, the coordinators and myself. And we got  
6 input from the teachers, too. They had an opportunity  
7 to look at these as well.

8 MS. JOHNSTON: Hey, I'm sorry to interrupt.  
9 The volume seems to be a little softer than it  
10 was earlier. I don't know if the microphone got  
11 moved. But it's gotten a little bit harder to  
12 hear.

13 THE VIDEOGRAPHER: Let's -- okay, let's go  
14 off the record briefly. Off the record at 3:32  
15 p.m.

16 (Comments off the record.)

17 THE VIDEOGRAPHER: Back on the record at  
18 3:33 p.m.

19 BY MS. HAMILTON:

20 Q. Do you know if any other GNETS programs have  
21 a similar level system?

22 A. I'm pretty sure that most of them use some  
23 type of system that's like this, just through  
24 conversation.

25 Q. But not the identical document?

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1 A. I don't think they're identical.

2 Q. Does every teacher and classroom in the Sand  
3 Hills program use this level system?

4 A. Oh, absolutely. And the students can share  
5 it with you verbatim, and they let you know when it's  
6 not being followed.

7 Q. So can you give me an overview of how the  
8 level system works?

9 A. So the level system provides the students  
10 and the staff and anybody who walks in the classroom  
11 with a visual of what's going on with the students.

12 We also use this to look at how much  
13 progress the students are making through the level  
14 system. Part of this is going to help us make a  
15 determination about when the student may be ready to  
16 transition out of the program and be reintegrated back  
17 into their home school.

18 And so it gives us -- the students can  
19 self-monitor, the support staff when they walk into  
20 the classroom, they can use it to self-monitor, and it  
21 also gives students a concrete way of going back and  
22 they will go back and pull this form, or ask me to  
23 pull the form and say: Tell me what I can do when  
24 this happens; or: The teacher wasn't supposed to do  
25 this and she implemented this consequences, but the

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1 sheet says that that's not what we're supposed to do.

2 So it just helps serve as a guide and a  
3 visual for the students to be able to see the progress  
4 that they've made.

5 Q. So the document shows that a student can  
6 reach a different level if they earn a certain number  
7 of points?

8 A. Mm-hmm (affirmative).

9 Q. How do you earn those points?

10 A. So the points are -- basically, if you look  
11 at the back, that's looking at how they earn their --  
12 there is a point sheet they get every single day they  
13 take home as a means to communicate with the parents  
14 as well on the type of progress that the students are  
15 making or not making. And also the parents get to see  
16 when the children move up the level system.

17 So they earn points and their points are  
18 reflected on their point sheets that go home to the  
19 parents. They can earn points, or they also earn STAR  
20 bucks, so it's tied to PBIS as well. The coloring  
21 that's in here is tied to our PBIS matrix as well as  
22 the students go through the course of the day.

23 And then the other part is when you look at  
24 the point sheets, the point sheets are divided up into  
25 periods throughout the course of the day, and so you

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1 might have breakfast, first period, second period,  
2 PE -- might be PE is third period, lunch and it goes  
3 through the course of the day.

4 Q. And what exactly -- I know you said the  
5 points are tied to the PBIS system.

6 A. Mm-hmm (affirmative).

7 Q. What are ways that students can earn points?

8 A. So we have a STAR matrix. We are actually  
9 updating that for FY '23 as well. The students can  
10 earn their STAR bucks by implementing the appropriate  
11 behaviors that are listed on the STAR matrix. And so  
12 the STAR matrixes are all throughout the building in  
13 both sites. They list behaviors that are expected in  
14 the classroom, in the media center, in the gym, in the  
15 hallways and on the bus.

16 And anybody can award STAR bucks to a  
17 student if we see them demonstrating appropriate  
18 behaviors in those areas.

19 Q. So also just looking at this first page it  
20 appears that a student has to maintain a certain  
21 number of points for a certain number of consecutive  
22 days to move up to the next level; is that correct?

23 A. That's correct.

24 Q. Okay. So taking a student at Level 1, it  
25 says five consecutive days of 70 and then they are

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1 moved to Level 2?

2 A. Mm-hmm.

3 Q. Okay. Do all students start at Level 1 when  
4 they start in the GNETS program?

5 A. Huh-uh. They come in at Level 2.

6 Q. Okay. And does that mean they start at  
7 80 points?

8 A. Mm-hmm (affirmative).

9 Q. And then if they're starting there, in order  
10 to -- I'm just walking through and making sure I  
11 understand.

12 A. That's fine.

13 Q. In order to reach Level 3, they have to have  
14 ten consecutive days of 80 points; is that correct?

15 A. That's correct.

16 Q. Okay. So if they have a day where they  
17 engage in behaviors that don't meet the requirements,  
18 does that time period start over for them working  
19 toward the Level 3?

20 A. It would depend on the action. So you might  
21 have to go back to what's on the front page to  
22 determine whether or not a child needs to drop a  
23 level, they might have to go back to the beginning, or  
24 they might have to go back two to three days for the  
25 types of behaviors that they engaged in that might not

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1 be appropriate.

2 Q. What would be an example of the reason a  
3 student would have to drop an entire level?

4 A. Physical aggression.

5 Q. And then they'd have to have a certain  
6 number of consecutive days at a certain level of  
7 points to get back to their prior level?

8 A. Correct.

9 Q. Do you ever have students who get stalled at  
10 one level? So let's say if you're at a Level 2, it  
11 says you have to have ten consecutive days of 80, and  
12 they get to day eight, and then they engage in a  
13 behavior that forces them to start over, like do you  
14 have students who go through that cycle repeatedly?

15 A. Yes. And we have students who appeal that  
16 sometimes, so yes.

17 Q. And when you say students appeal, what does  
18 that mean?

19 A. So let's use physical aggression as an  
20 example. So we have a student who might drop a level  
21 because they engaged in a fight with a staff -- with a  
22 student. But the student might be like, well, you  
23 dropped me a level but I didn't really start it.

24 And sometimes they'll come back and appeal  
25 it, and sometimes they win their appeal, and you know

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1 what, you really didn't start it, you might have been  
2 responding to something that was beyond your control  
3 that caused you to act out that way, and sometimes  
4 those appeals are granted.

5 So they can come back and appeal their level  
6 drop if they need to.

7 Q. On the second page it says Level 1 --  
8 actually, let me take a step back.

9 On the second page for Level 2 -- and you  
10 said all students start at Level 2; is that correct?

11 A. Mm-hmm (affirmative), when they come in the  
12 program.

13 Q. So when a student comes into the program, in  
14 the cafeteria they all have assigned seating?

15 A. Since --

16 Q. Assuming they use the cafeteria?

17 A. Well, since I have been there we haven't  
18 used the cafeteria. But for next year they'll --  
19 their seating will be they'll sit with their teacher  
20 when they go into the cafeteria starting out.

21 Q. Okay. And on the chart it says that that's  
22 usually what is required for a level -- students at  
23 Level 1?

24 A. Mm-hmm (affirmative).

25 Q. So the Level 2 students would also have the

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1 same requirement as Level 1 students to sit with the  
2 teacher?

3 A. Well, starting out because we haven't been  
4 in the cafeteria for a number of -- we're going on  
5 year two.

6 Q. Okay. And then for transitions it says  
7 Level 1 and Level 2 must be escorted at all times and  
8 in sight of an adult; is that right?

9 A. Actually, all students are. That's a change  
10 that we're going to make that all students be in the  
11 line of staff at all times.

12 Q. So regardless of your level you have to be  
13 escorted by a staff member?

14 A. Mm-hmm (affirmative).

15 Q. In the bottom -- in this chart, this says --  
16 moving up in the last row -- it says "Consider Outside  
17 Placement"?

18 A. Mm-hmm (affirmative).

19 Q. What does that mean, and how exactly does  
20 that work?

21 A. That's almost like a celebration. So when  
22 students get to Level 4, and they reach the 20th day  
23 we automatically schedule a meeting to consider  
24 transitioning that student back. Because it takes  
25 them some work to get to Level 4 day 20. And so they



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1 have gotten far, we really need to consider placing  
2 them back in their least restrictive environment.

3 Q. So is reaching Level 4, day 20 a  
4 consideration for a student being transitioned back?

5 A. Yes.

6 Q. Last school year how many students did you  
7 have who reached that level?

8 A. Let me see. Thomson, four -- I'm going to  
9 say we got five in Thomson and four in Richmond.

10 Q. And how many of those students were  
11 considered for being transitioned out of the GNETS  
12 program?

13 A. All of them. Mm-hmm (affirmative). We had  
14 meetings on all of them.

15 Q. Were any actually -- so beyond the meetings,  
16 did any actually transition last year?

17 A. All but two transitioned.

18 Q. Okay. How many for each program?

19 A. Let me see. Did I say five in Thomson?

20 Q. Yes.

21 A. All five of them in Thomson transitioned.

22 And then actually we had more than that in  
23 Richmond. Might have had -- might have had five in  
24 Richmond because two did not. So three in Richmond  
25 transitioned, started the transition process, and two

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1 did not.

2 And one of them it wasn't because he  
3 couldn't -- wasn't able to. He had some challenges  
4 because he had concerns about exposing his grandmother  
5 to COVID. He didn't want to go into another school  
6 and expose his grandmother to the possibility of  
7 getting COVID because she has underlying health  
8 conditions.

9 Q. In the earlier Exhibit -- let's see --  
10 Exhibit 5 for Thomson, it had noted that there were  
11 three students who had transitioned. Were there  
12 additional students who transitioned later in the  
13 school year?

14 A. And when she pulled that out, I realized I  
15 was giving you information for FY '22. So that -- so  
16 when you say last school year I'm thinking this one  
17 that just ended, FY '21-'22. Did you want me to  
18 reference this one?

19 Q. '21-'22.

20 A. Yes, because this one was done in August so  
21 as the year progressed we added more students.

22 Q. Okay. So by the end of the year you said  
23 five --

24 A. Mm-hmm (affirmative).

25 Q. -- transitioned for Thomson?

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1 A. Mm-hmm (affirmative).

2 Q. And, similarly, in that same spreadsheet for  
3 Richmond there were three students who were listed as  
4 transitioning as well --

5 A. Mm-hmm (affirmative).

6 Q. -- is that accurate? Or were there  
7 additional students as the year went on?

8 A. Oh, you know what, I'm trying to look at the  
9 names.

10 Yes, there were five.

11 Q. For Richmond?

12 A. For Richmond, mm-hmm (affirmative). And two  
13 of them did not transition out, actually. I'm sorry.  
14 There were six for Richmond.

15 Q. Six who were considered --

16 A. Mm-hmm (affirmative).

17 Q. -- for transition?

18 A. Two, mm-hmm (affirmative). Two of those did  
19 not.

20 Q. Okay. So then all of those students reached  
21 Level 4 in the level system?

22 A. Yes.

23 Q. And I know earlier you had mentioned I think  
24 there were -- I'm just comparing the number of  
25 students who you said had reached Level 4.

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1 MS. HAMILTON: And I do just want to note  
2 for the record that any markings that are on the  
3 exhibits are being made by the witness, but those  
4 weren't our handwritten notes.

5 THE WITNESS: I'm not supposed to write on  
6 them?

7 MS. FLETCHER BOWDEN: That's okay.

8 A. Oh, okay. You take all these back?

9 BY MS. HAMILTON:

10 Q. They'll go into the record.

11 A. Oh, I'm so sorry. I thought these were  
12 mine.

13 Q. It's fine. I just want to make sure they  
14 know that we didn't put those notes there.

15 MS. FLETCHER BOWDEN: You're asking her to  
16 do math, though.

17 A. I had to write kids' names -- students down.

18 BY MS. HAMILTON:

19 Q. I would probably say if you're writing  
20 student names, you may want to mark that out before --

21 A. I used initials. I did have the foresight  
22 to do that.

23 Q. But would you say the number of students who  
24 transitioned is consistent with the number who reach  
25 Level 4?

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1 A. Yes.

2 Q. And so is that the only consideration for  
3 students transitioning, or what other things are  
4 looked at?

5 A. Oh, huh-uh. We actually had a student who  
6 didn't reach Level 4 who was participating in some  
7 outside classes. So consideration might be we'd look  
8 at conversations that we've had with the students  
9 because sometimes you just want to sit down and talk  
10 to the, about, you know, tell us things that you're  
11 interested in doing, what do you think can help you  
12 get to that, you know, your goals and stuff.

13 But one of our students, she didn't finish  
14 the year with us. She transferred out of state. But  
15 she really wanted to go back to her zone school and  
16 she felt like -- she was a senior in high school, and  
17 so we did try her. She hadn't reached Level 4. But  
18 we put her out in some of her classes, pulled the IEP  
19 team together, talked about those things she was  
20 interested in and gave her an opportunity to do some.

21 Q. Are there any exit criteria that are set by  
22 the State that you have to follow when considering  
23 whether a student can return to their home school?

24 A. Not any longer. We don't have exit criteria  
25 any more. There used to be, but not now.

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1 Q. And does your program have any set exit  
2 criteria?

3 A. We have a lot of things we consider. One of  
4 them would be, you know, have they gone up the level  
5 system, information and feedback from the students.  
6 One of the things that we're looking at for -- we  
7 started FY '22 and FY '23 is, you know, how long has  
8 the students already been placed in the program, and  
9 are there other -- are there actual activities or  
10 courses that a child could participate in and be  
11 successful. Again, we want to get that input from the  
12 students about that as well. And then we consider  
13 input from the parents, too. And then the team comes  
14 object to and makes a decision.

15 Q. Have you received any guidance from the  
16 State on developing or using reintegration plans?

17 A. Not in the two-and-a-half years that I have  
18 been there. But I believe there's been some  
19 discussion prior to that because the reintegration  
20 plans were already place when I came on board. And we  
21 could have a process for that.

22 Q. Okay. And what exactly is a reintegration  
23 plan?

24 A. What do we need to -- what types of supports  
25 do we need to put in place to help the child be

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1 successful in their transition. We never want to just  
2 place a child out, or send a child back to their  
3 previous placement without some types of supports in  
4 place.

5 So it might be anything as simple -- we  
6 always want to make sure that we take the child out,  
7 let them tour the facility, get them used to the  
8 school that they are going to be going back to or  
9 going to. We have them talk to the teachers. We meet  
10 with the parents. We talk to them.

11 The first day that the child goes back, we  
12 actually have staff go there with them to kind of make  
13 sure they're comfortable. We do pop-up visits to see  
14 how the children are doing. They'll be sitting there  
15 -- and they're real funny because they act like they  
16 don't know you when you get there. But we do things  
17 like that. And then we consult. We use a tracking  
18 sheet to kind of monitor how much progress the  
19 students are making when they are there. Sometimes we  
20 get feedback from parents, sometimes we get feedback  
21 from the students themselves. They'll come back and  
22 say, hey, you know what, I'm struggling in this math  
23 class, can you kind of go over this with me. They'll  
24 share that with their teacher. Because we want them  
25 to have the smoothest transition as possible. And so

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1 those are some of the things we do as part of that  
2 reintegration plan.

3 Q. How long do you continue to monitor their  
4 progress?

5 A. Since I've been there, we've been able to --  
6 typically after nine weeks we might consult with them  
7 after nine weeks, but typically during the nine weeks  
8 we're able to pull back some of that support that  
9 we're providing. And but we always let them know if  
10 there is ever a need for our services with a student,  
11 we are available for that.

12 Q. And of the students last year who  
13 transitioned, did you have any who ultimately returned  
14 to GNETS? I know you said there were some who did not  
15 transition who were considered.

16 A. We had one. He was in the Thomson, excuse  
17 me, the Richmond site. And so what that taught me as  
18 a -- and I consider myself kind of new because I  
19 didn't have the privilege of having three full  
20 consistent years of being in the program, but we  
21 transitioned a student out probably around March and  
22 April, which probably wasn't a good time, going back  
23 to look at that, because there were some -- you know,  
24 we do a standardized testing. And so the schedule for  
25 the student kept changing depending on who had to



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1 cover testing.

2 And so from that we have learned that, you  
3 know, when we transition the students in we want to  
4 make sure that the schedule is consistent, that you  
5 know, the child is going to the same staff member on a  
6 regular basis so he can help build those relationships  
7 with the staff and with the students.

8 But we pulled him back, and we'll start him  
9 back. We had -- the IEP team came together and  
10 decided that we'd pull him back and start him back at  
11 the beginning of the school year so that he could be  
12 in there when the schedule was pretty firm and solid  
13 and he could go to the same place every day.

14 Q. And for the students who did transition last  
15 year, did they transition for the full school day, or  
16 was it some part of the day?

17 A. We'd start them off with part-day  
18 transitions to see how they do, and then we increase  
19 it over time.

20 For one of our students I think we started  
21 out where he might just have to come in and do a  
22 check-in. And then he would come in -- by the time we  
23 got to the six weeks he was like "I don't need to come  
24 back."

25 And he really didn't need to come back. And

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1 so after that we were able to transition him out full  
2 day. But we always start out with trying them in some  
3 classes, see how they do, providing the support,  
4 coming over, doing the observations, and then we come  
5 back as a team and go ahead do the full integration  
6 plan, but letting them go back full-time.

7 Q. And the students who you listed, by the end  
8 of the year the ones who were still in the program,  
9 were all of them full day transitions, or were some  
10 still partial day?

11 A. For the ones who are coming back for next  
12 year?

13 Q. The students last school year who -- like  
14 when they were transitioning?

15 A. Okay. So, yes. Some of them will be coming  
16 back to us on a part-day transition. Is that the  
17 question that you were asking?

18 Q. Yes.

19 A. Okay.

20 Q. Okay. So some of those -- not all of those  
21 students who transitioned last year ever reached the  
22 full transition?

23 A. Oh, no. Some of them did reach full  
24 transition. We're going to have a couple who are  
25 going to come back where they are still doing partial

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1 day transition, and then before the end of the nine  
2 weeks we'll meet to determine whether or not they are  
3 ready for full day transition.

4 Q. So there are a few who are still doing  
5 partial day?

6 A. Right. Mm-hmm (affirmative).

7 Q. All right. This is going to be a  
8 transition. I want to talk to you a bit about the  
9 grant process and strategic plan that you-all follow.  
10 And I guess I just -- I do want to start out just by  
11 talking about funding.

12 I know that GNETS has a number of sources.  
13 Can you walk me through the various sources of funding  
14 that you-all receive for your program?

15 A. So we receive the IDEA funds. We receive  
16 the State funds. Some of the programs receive a  
17 special grant for additional therapeutic services, and  
18 that allowed me to hire an additional social worker  
19 full-time. And then we got some additional funding  
20 for the next three years, over three years, for  
21 additional therapeutic services.

22 Q. Separate from the special grant, or is that  
23 as a part of the special grant?

24 A. It's separate. Mm-hmm (affirmative).

25 Q. Which one of those is the 62,500?

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1 A. The last one.

2 Q. Okay. And that's also money from the State?

3 A. Mm-hmm (affirmative). We received title  
4 funds through the -- let's see. As a result of COVID.  
5 It's a \$15,000 funding for school supplies for nurses  
6 and nursing supplies. And we received an additional  
7 grant as a result of COVID. And those are all the  
8 grants.

9 Q. Okay. And I guess just to make sure I'm  
10 covering all the different places where you get  
11 funding from. Do you receive any per-pupil funding  
12 through the QBE formula or Quality Basic Education  
13 formula?

14 A. Not directly, huh-uh.

15 Q. Okay.

16 A. That funding goes direct to the system and  
17 there is some calculation that's done to determine how  
18 funding is generated for our program.

19 Q. Okay. So you're saying the money for the  
20 QBE goes to the school systems?

21 A. Well, what they do is they turn in -- my  
22 understanding is that the FTE information for students  
23 participating in GNETS is submitted by the  
24 participating school system. That information is used  
25 to determine the allocations of the funding that we

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1 receive in our GNETS program.

2 Q. And is that a separate stream of funding, or  
3 does that fall under one of the other categories you  
4 mentioned earlier?

5 A. That's how the funding is determined for  
6 those different funding categories.

7 Q. So you might get some of this funding in the  
8 form of the State grant, or in the form of?

9 A. 6B.

10 Q. What's 6B?

11 A. I'm sorry. IDEA.

12 Q. Part of the IDEA funding?

13 A. Yeah.

14 Q. Do you receive funding directly from any of  
15 the LEAs?

16 A. No.

17 Q. And do you receive funding directly from the  
18 RESA?

19 A. No.

20 Q. Do you receive any kind of in-kind support  
21 from the LEA whether staff or facilities, whatnot?

22 A. Yes.

23 Q. Okay. And what does that look like?

24 A. Para -- additional paraprofessionals, school  
25 nurse, psychologist, public safety, IT. Let's see.

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1 The transportation that's provided. The attendance on  
2 the busses when they're transporting the students.  
3 Professional learning.

4 Q. And what about from the RESAs? And do you  
5 receive any in-kind support, whether staff,  
6 facilities, materials, or other types of --

7 A. Absolutely the support. Professional  
8 learning, we participate in that. Access to their  
9 services providers who are there. They have a teacher  
10 induction program for new teachers. Our teachers can  
11 participate in that as well.

12 Q. Does your program participate in free and  
13 reduced price lunch programs, lunch and/or breakfast?

14 A. Yes. I think all the participating school  
15 systems had a special grant where the students got  
16 free lunch and free breakfast.

17 Q. And the GNETS program falls within that?

18 A. Mm-hmm (affirmative).

19 Q. And then let's go back up to some of the  
20 larger funding sources you mentioned.

21 For the IDEA funds, what are you able to use  
22 those funds for?

23 A. I primarily pay for our paraprofessionals  
24 out of that grant, in addition to substitutes who  
25 might have to come in to work for them. There might

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1 be a small line item for instructional materials.

2 Q. And do you know how much, roughly, you  
3 received last year?

4 A. Probably about 145,000 for that.

5 Q. And is that about the same each year?

6 A. Mm-hmm (affirmative). Since I have been  
7 here.

8 Q. Do you know what you've been allotted for  
9 next school year?

10 A. I think it's 141,000. I have to have go  
11 back in and confirm that.

12 Q. Okay. But around that number?

13 A. Mm-hmm (affirmative). It wasn't a big -- it  
14 was not a big change.

15 Q. Okay. And do you have to apply for those  
16 funds, or are they automatically provided?

17 A. We don't necessarily have to apply for them,  
18 but we have to make sure that we input all the  
19 information that's required under the strategic plan  
20 in that -- on the portal. And then once that's  
21 approved, the funds, monies are released.

22 Q. Okay. And then for the State funding,  
23 approximately how much did you receive last school  
24 year for your GNETS program?

25 A. About 1.4 million.

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1 Q. Okay. And how does that compare to what you  
2 have been given for this upcoming school year?

3 A. It's about the same.

4 Q. And would you say that's been consistent for  
5 the last few years?

6 A. For the past two years, yes.

7 Q. And what are those funds used for?

8 A. Those funds are used to pay for professional  
9 learning, pay for teachers, pay for admin staff,  
10 that's the coordinators. Office staff, 90 percent is  
11 personnel. Well, I want to say 95 percent is probably  
12 personnel.

13 The other items funding is used to pay for  
14 instructional resources and professional learning. I  
15 think there is a small line item for audit costs and  
16 indirect costs.

17 Q. And then you mentioned the special grant for  
18 therapeutic services. I know earlier we talked about  
19 how you-all were able to get the social worker and the  
20 counselor and some other services. Did that fall  
21 under that particular grant?

22 A. No. That's a separate grant.

23 Q. That's the 62,500?

24 A. That's the 62,500.

25 Q. Okay. So what is the special grant for



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1 therapeutic services?

2 A. That's the \$62,500. That's the only thing  
3 we can use it on is providing additional support  
4 beyond what the students were already receiving, and  
5 so that's used to pay for those contracted services  
6 for the Namaste program.

7 We had social workers there who come on site  
8 to provide support to the students in both locations.  
9 That's the additional part-time social worker that we  
10 have, and the counselor.

11 Q. You said that's for three years?

12 A. Mm-hmm (affirmative). So we've already  
13 finished year one, so we've got two years remaining.

14 Q. Okay. And I -- just to make sure I'm clear,  
15 did you say that there -- there is the additional  
16 funding of the 62,500 -- is there an additional  
17 special grant for therapeutic services, or?

18 A. I have two.

19 Q. Okay.

20 A. So one of them allowed me to pay for an  
21 additional social worker --

22 Q. Okay.

23 A. -- to provide therapeutic support. So I  
24 have her. And then the additional 62,500 to buy -- to  
25 provide therapeutic supports beyond what they were

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1 already receiving.

2 Q. Okay.

3 A. And that one is for all the GNETS programs  
4 got that one. Select programs got the social worker  
5 grant.

6 Q. Okay. And so just to make sure my -- the  
7 record is consistent on this. So the special grant  
8 for therapeutic services that funded your social  
9 worker, how much was that grant for?

10 A. Oh, goodness.

11 Q. Approximately.

12 A. It's between 72,000 and 75,000.

13 Q. Okay. And was that a grant provided by the  
14 State?

15 A. It is.

16 Q. Okay. Is there an endpoint for receiving  
17 that funding, or is it provided every year?

18 A. I think they look at it every single year  
19 because they give us the approval. I don't know of an  
20 end date, but there could be. I'm just not familiar  
21 with it.

22 Q. Okay. And you said it's for select  
23 programs?

24 A. Mm-hmm (affirmative).

25 Q. What distinguishes your program as to why

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1 you would receive it?

2 A. The director who was here before me probably  
3 advocated very hard to be a part of that and received  
4 it, and it was already in place when I came on board.

5 Q. Okay. And then there is another source of  
6 funding that's also from the State that's for 62,500?

7 A. Mm-hmm (affirmative).

8 Q. And that covers some of the additional  
9 therapeutic services that you mentioned --

10 A. Yes.

11 Q. -- a moment ago. And that's for all GNETS  
12 programs?

13 A. Correct.

14 Q. Okay. For the 1.4 million state funds, do  
15 you have to apply for that funding?

16 A. We don't have to apply for it, but it goes  
17 back -- you have to make sure that your information is  
18 entered in the GaDoE portal under your strategic plan.  
19 Under your GNETS. I'm sorry. Under your GNETS plan.

20 Q. I guess before I move on I just want to make  
21 sure, have you-all sought any funding related to  
22 facilities improvement or renovation?

23 A. No.

24 Q. And do you-all receive any training, I guess  
25 in-kind support services, in the form of training or

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1 support from the Georgia Center of Excellence at  
2 Georgia State?

3 A. Not this past two-and-a-half years, but I do  
4 know that they have received training in regarding  
5 functional behavior assessments and behavior  
6 intervention plans.

7 Q. And is that something that the program  
8 sought out, or something that the State of Georgia  
9 coordinated?

10 A. I'm not really sure. But I know that we've  
11 been monitoring to see when they are going to have the  
12 training again so that we can send additional staff in  
13 the future.

14 Q. All right. So I'd like to talk a bit more  
15 about the process by which you get the State funding.

16 A. Mm-hmm (affirmative).

17 Q. So is that, just to make sure I'm clear, is  
18 that the same thing as the consolidated application  
19 you're referring to?

20 A. It's a different -- it's in the same  
21 platform. But GNETS has its own section --

22 Q. Okay.

23 A. -- in there. And so we go in and complete  
24 -- it's a series of information that we have to submit  
25 along with supporting documents that document or show

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1 what we're doing in our individual programs. And many  
2 of the questions that you're asking are a lot of the  
3 questions that we have to respond to in our GNETS  
4 application.

5 The State representatives for our program go  
6 in and review the information. If they're -- they may  
7 approve it, and if they approve it, you need to move  
8 it to the next step where you can go ahead and  
9 complete your budget and get that approved.

10 But before your budget is approved, the  
11 budget person assigned from the State reviews the  
12 budget to make sure we're spending the money like  
13 we're supposed to. They can approve it. If they  
14 don't, they'll send it back with some notes telling us  
15 what we need to do or consider and then we resubmit  
16 it.

17 Q. And who's the State representative for GNETS  
18 who reviews your information?

19 A. LaKesha Stevens and Vickie Cleveland.

20 Q. And then you said also there is a budget  
21 person from the State who reviews. Who is that?

22 A. I believe my person's last name is Melissa  
23 Roberts. I think her name is Melissa Roberts.

24 Q. Do you know her title?

25 A. I don't.

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1 Q. Okay. But she handles budget issues?

2 A. She's part of the budget team for special  
3 education, yeah. And so they're assigned by regions  
4 or areas, and she's the person assigned to our area.

5 Q. Who completes the application and process in  
6 your office?

7 A. I get information from the social workers.  
8 I get information from the counselor and the teachers,  
9 along with the coordinators at both sites, and I enter  
10 the information into the platform for GNETS and I  
11 submit it.

12 Q. Okay. And are there any interviews or  
13 on-site visits specific to the grant process?

14 A. If we're going through a review there are  
15 on-site visits, which we just had one not too long  
16 ago, cross-function monitoring. They'll come on site  
17 for those.

18 Q. Okay. And is that related to the strategic  
19 plan, or different?

20 A. It's different.

21 Q. Okay. You said cross-function monitoring?

22 A. Mm-hmm (affirmative). Cross-functional  
23 monitoring. That's done for programs who receive any  
24 types of federal funds.

25 Q. Okay. How often does that occur?

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1 A. I want to say they have a cycle of every  
2 five or could be seven years, so five to seven years.

3 Q. And you said it just recently happened for  
4 your program?

5 A. Mm-hmm, mm-hmm (affirmative).

6 Q. What did that entail?

7 A. I had to provide information regarding the  
8 federal funds that I received, how are we spending  
9 those things, am I meeting with -- am I meeting with  
10 our finance department to review the spending that  
11 we're following, do I release the funds.

12 They basically look at the procedures that  
13 we use for spending, and do we maintain that  
14 documentation, are we using the money for what we're  
15 supposed to be using it for.

16 Q. And do you receive any sort of stamp of  
17 approval or score in connection with that?

18 A. Well, haven't nobody gave me -- yes. So  
19 there is a supposed to be feedback if you don't do  
20 well, and I guess you get feedback if you do well.  
21 And if you don't do well you're going to be required  
22 to do a corrective action plan that's going to require  
23 you to make those actions within -- correct those  
24 actions within one year.

25 Q. And does this cross-functional monitoring

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1 process that you said occurs every five to seven  
2 years, does this apply for every GNETS program?

3 A. Yes. They have to participate as well.

4 Q. And does it apply to every school in the  
5 State?

6 A. Yes, if they get federal funds.

7 Q. Okay. Or I guess school district?

8 A. Title funds, yes.

9 Q. So I guess returning back to the grant  
10 process, so assuming all of your materials have been  
11 approved does the grant itself prescribe what the  
12 funds have to be used for?

13 A. They don't prescribe necessarily what it has  
14 to be used for, but we do have to make sure that we  
15 follow the spending guidelines regarding what's  
16 allowable and unallowable expenses.

17 So if there is special criteria like the  
18 62,500, which they did put in specifically this is  
19 what that money is supposed to be used for, and they  
20 were very clear that's what the money was supposed to  
21 be used for. So if they do, they let us know. That's  
22 the only one. I take that back. The one for the  
23 social worker is specifically for the social worker.  
24 So, yes, they -- they can do that and they have done  
25 that.



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1 Q. Are there any other grants that have  
2 specific conditions on how the funding is used?

3 A. No, other than nothing but the except for  
4 the time frame, like with the CARES Act for the nurses  
5 and the CARES Act for the additional funding that we  
6 received. Just have to make sure that you use those  
7 within a certain amount of time, and also that you  
8 maintain the documentation and with allowable cost and  
9 unallowable cost. I can feel myself fading. I'm  
10 sorry.

11 MS. FLETCHER BOWDEN: Do you need a break?

12 A. No, it's not the break.

13 MS. FLETCHER BOWDEN: You need a red hot,  
14 some caffeine?

15 THE VIDEOGRAPHER: Caffeine?

16 THE WITNESS: I might need something, but we  
17 can keep going.

18 BY MS. HAMILTON:

19 Q. If you do need a break, I think -- we really  
20 appreciate your time today.

21 A. Mm-hmm (affirmative).

22 Q. All right. So I want to transition now to  
23 discuss the strategic plan, which I know has come up a  
24 few times in our conversation. And let you finish  
25 first.

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1 Okay. So what is the GNETS strategic plan?

2 A. So the strategic plan for GNETS, it started  
3 out with seven different areas to look at, but it's  
4 been revised about two years ago and it looks at six  
5 different areas. It looks at accountability in  
6 leadership. It looks at therapeutic supports and  
7 services. It looks at the instructional programs that  
8 we have for our students. It looks at -- did I say  
9 facilities? I should have been writing them down when  
10 I was telling you.

11 Q. Not yet.

12 A. It looks at how well do we collaborate with  
13 outside agencies, and -- how many I did give you?

14 Q. I have accountability in leadership,  
15 therapeutic support, instruction, facilities,  
16 collaboration, so five.

17 A. Did I give funding?

18 Q. Not yet.

19 A. Okay. Then funding is the sixth one.

20 Q. Okay.

21 A. And then there are different types of things  
22 that we have to make sure that we are documenting.  
23 One of the main things is making sure that we keep  
24 stakeholders involved and aware of what's going on.

25 If I had to look at the biggest area for

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1 what we do on site it would be those therapeutic  
2 supports and services, are we providing those, what  
3 does that look like. And what is the place for each  
4 of our programs on how we're providing those services.  
5 Are we bringing in tutoring interventions for the  
6 students, and what does that look like. We have a  
7 plan in place for that. Are we using positive  
8 behavior, interventions and supports, and we have  
9 something in place for that. How do we monitor that  
10 information. How do we collect that data, and we turn  
11 in that information for that as well.

12 A lot of our information is for students for  
13 academic and therapeutic intervention and supports.  
14 Our program uses something called an intervention  
15 notebook, and the intervention notebook allows to  
16 collect data on the child's academics as well as their  
17 behavior. It tells us what tier they are on. It  
18 could change throughout the school year. It shows the  
19 tiers that are available, and the resources that are  
20 available.

21 So when you look at it on the front of the  
22 notebook you'll have the child's information, but  
23 you'll also have a pyramid that those what we do for  
24 students who are on Tier I, Tier II, Tier III, for  
25 behavior. And then on the back of the cover of the

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1 notebook you'll see interventions for Tier I, Tier II,  
2 Tier III, for reading and math.

3 The plan that we have in place is based on  
4 the plan for the system, I mean, for the State. The  
5 State provides resources for us to be able to  
6 implement some of those areas on the strategic plan.

7 The second area would be looking at the  
8 academic piece for the students and how to -- and they  
9 put some things in place for us to be able to monitor  
10 them by -- I think we're using -- I think we're using  
11 i-Ready to monitor the student's academic progress.

12 And they put a framework in place for us to  
13 kind of gauge how often students should be monitored  
14 on i-Ready, and the amount of time they should be  
15 using i-Ready throughout the course of the week.

16 Q. You said "they." Who is they?

17 A. I'm sorry. The State.

18 Q. Okay.

19 A. So they provided some guidance through the  
20 strategic plan that was already created, and we took  
21 that strategic plan and used it to develop the system  
22 plan or the program plan for the Sand Hills program.

23 There is information in the strategic plan  
24 about the funding, do you follow the procedures and  
25 the guidelines, you know, that are set in the State

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1 for the systems on how you spend your money, making  
2 sure that you're looking at the allowable and  
3 unallowable costs for spending, are we meeting the  
4 deadlines for the budgets and are we sharing the  
5 information about the budgets with our stakeholders.

6 Inter-agencies and parent engagement all  
7 falls in that together. What types of activities are  
8 we doing to ensure that parents are engaged, how do we  
9 reach out to outside agencies to provide supports for  
10 our students.

11 And we have a couple of outside partners  
12 that we use who come in and provide additional  
13 support. They do parent training for our parents.

14 We participate in -- and I know I'm not  
15 going to remember what this is, but they have  
16 community types of meetings to provide supports for  
17 students. And it's called LIPT, but please don't ask  
18 me what it means because I can't remember right now.  
19 They have the LIPT meetings.

20 We have another program that we work with,  
21 we talked about that earlier --

22 Q. Is that L-I-P-T?

23 A. LIPT.

24 Q. Mm-hmm (affirmative).

25 A. But we also have a program I mentioned

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1 earlier that a lot of students who might be referred  
2 through the Chance program, and that involves the  
3 Department of Juvenile Justice. We work closely with  
4 them for some of our students.

5 And we have an agreement with Dr. Londino.  
6 She's a local psychologist -- psychiatrist who comes  
7 on site. She visits both sites twice a month. She  
8 and her interns come out and provide support to our  
9 students. That's a win-win situation. She has her  
10 interns come out. She's always there when they are  
11 there. If we have a student in crisis, or we might  
12 need to refer students for direct support, we have  
13 that as well.

14 So the strategic plan looks -- it's like a  
15 whole comprehensive plan to look at the needs of the  
16 program as a state, and then individually for the '24  
17 cycle.

18 Q. Thank you very much. Do you need a break,  
19 or how are you doing?

20 A. I might need something.

21 (Comments off the record.)

22 THE VIDEOGRAPHER: Okay. Are you guys in  
23 agreement to go off the record?

24 MS. HAMILTON: Yeah.

25 MS. FLETCHER BOWDEN: Yeah.

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1 THE VIDEOGRAPHER: Off the record at  
2 4:18 p.m.

3 (Recess 4:18 p.m. - 4:27 p.m.)

4 THE VIDEOGRAPHER: Back on the record at  
5 4:27 p.m.

6 BY MS. HAMILTON:

7 Q. Ms. Newsome, right before we stopped for a  
8 break we were talking about the GNETS strategic plan.  
9 And just to be clear, the GNETS strategic plan is a  
10 plan that the State has created that pertains to the  
11 GNETS program?

12 A. Yes.

13 Q. Okay. And it sounds like there is a few  
14 different steps that are involved. So I understand  
15 that there's like a implementation fidelity checklist  
16 and a self-assessment rubric.

17 Are you familiar with those documents?

18 A. I think I used those at the beginning. We  
19 did a monitoring my first year, so, yeah.

20 Q. Okay. So is that a process where you're  
21 doing a self-reading of the GNETS program?

22 A. Mm-hmm (affirmative).

23 Q. Okay. Can you explain what that looks like?

24 A. Yeah. As a matter of fact, let me take that  
25 back. We do that every year twice a year, a

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1 self-assessment.

2 So at the beginning of every school year, I  
3 share information about the strategic plan -- well,  
4 for the past two-and-a-half years I share information  
5 about the strategic plan, what it entails. We talk  
6 about the components and what it would look like when  
7 it's implemented in the program at the beginning of  
8 the school year.

9 Midway through the year the staff -- excuse  
10 me -- the staff in both programs complete a  
11 self-assessment on whether or not we are meeting those  
12 areas in the strategic plan. And then at the end of  
13 the year they do another self-assessment in addition  
14 to making recommendations about things we could do to  
15 improve the program as a whole.

16 That information is used to help develop or  
17 update the plan that we have in place for the  
18 following school year.

19 Q. Okay. And who participates from your staff  
20 in this rating process?

21 A. All the staff participates.

22 Q. Okay. And by all staff that would include  
23 teachers?

24 A. Teachers, paras, counselors, the bookkeeper,  
25 the program evaluator, the admin assistants. We all



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1 participate in that.

2 Q. And what does that process look like? Are  
3 you-all, like, in a room talking through these issues,  
4 or can you explain that a little bit better?

5 A. So we decided to do it electronically again.  
6 We're in a virtual age, and the requirements for doing  
7 that didn't go away. So we did it virtually, which  
8 worked out pretty good because we were able to get  
9 everybody's input. We put it in a Google Docs.

10 And then the admin team met to review the  
11 information that was included, look at the  
12 recommendations made by the staff, and came up with  
13 a -- determining whether or not we needed to make any  
14 changes to the plan we had, and what type of revisions  
15 we needed to make.

16 And then that information was used to  
17 document that we were doing it, and to make up dates  
18 to our plan and submit that in our platform.

19 Q. Okay. And when you submit these documents  
20 in the platform, what platform is that?

21 A. It's the GaDOE platform for the GNETS plan.

22 Q. And do you know who from the Department of  
23 Education reviews that document -- sorry -- reviews  
24 the documents when they are uploaded?

25 A. I'm going to say the same people, Vickie

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1 Cleveland and LaKesha Stevenson. And I'm not sure who  
2 outside of them would be looking at it, but I know  
3 they look at it.

4 Q. Okay. This past school year what did  
5 you-all determine were your priorities or areas of  
6 focus?

7 A. Our biggest priority was probably that  
8 parent engagement, interagency collaboration.

9 And so one of the things that we -- the past  
10 two-and-a-half years we haven't been able to get a lot  
11 of people to come on site because of COVID, and so  
12 we've been reaching out to some of the agencies or  
13 departments or programs that work with us.

14 We have a fraternity that adopted us. I  
15 know I'm going to get them wrong. But, anyway, we  
16 reached out and asked if one of them want to  
17 participate on our leadership team. Making sure that  
18 we get input from the students. So next year we'll  
19 make sure that we have a student on our leadership  
20 team as well. So that was the considered as our  
21 priority number one.

22 Q. And I know there are other steps involved  
23 with the strategic plan. Can you describe to us what  
24 the review process looks like?

25 A. So I was fortunate enough to go through a

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1 review my first year. It wasn't on site. But I had  
2 to turn in documents for all of those areas on the  
3 strategic plan that demonstrated that the plan was  
4 being implemented. And so there's a -- again, in the  
5 portal, you can uplift -- I mean, uplift -- upload the  
6 information for each of those areas in the strategic  
7 plan.

8 That information is reviewed. And then  
9 there's a rubric that you mentioned earlier that  
10 issues to determine whether or not we have met the  
11 compliance or the requirements of the strategic plan,  
12 those documents. And it's very time-consuming and  
13 lengthy.

14 Dr. Stevenson and Ms. Cleveland go through  
15 those documents with us, ask us questions, make  
16 recommendations about things we can do to improve, and  
17 if we're doing things that are really well, she might  
18 even ask us to present at one of our state meetings.

19 And then at the end -- we don't get the  
20 information about whether or not we have been found  
21 compliant or have met the requirements, a few weeks to  
22 a month after we had the review, then we'll get a  
23 letter that tells us how we did on our review, our  
24 focused monitoring.

25 Q. Okay. How many meetings are there with

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1 the -- with Ms. Stevenson and Cleveland?

2 A. There started out being monthly meetings.  
3 We would have meetings pretty regularly every month.  
4 They would be on my calendar. Excuse me. But towards  
5 the end of last year we didn't have them as  
6 consistently. So I'm going to say between probably  
7 after February we didn't have as many consistent  
8 meetings that were monthly. I want to say after  
9 February we may have met twice.

10 Q. And is that specific to the review process?

11 A. Our last -- one of our meetings was specific  
12 to the review process because that's when we were  
13 given information about the changes to the strategic  
14 plan, and how we were going to implement or upload  
15 those, that evidence. Because it used to be that when  
16 you never came up is when you'd get your review. But  
17 a lot of the information that we were turning in  
18 annually were things that already went with the  
19 evidence for the strategic plan. So it was decided  
20 that we would turn in documents annually that provided  
21 evidence of whether or not we were meeting the  
22 requirements of the other strategic plan.

23 Q. Okay. So you would turn in documents  
24 annually as part of a review process?

25 A. Starting this year.

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1 Q. Starting this year?

2 A. Mm-hmm (affirmative).

3 Q. Okay. Do you still get, like, rating scores  
4 at the end of each year in connection with the review  
5 process?

6 A. We have not gotten them yet. But the  
7 documents were due the end of June -- I mean, the end  
8 of May, and I know they are reviewing those plans now.

9 Q. Okay. For the prior school year what were  
10 your rating scores?

11 A. Operational.

12 Q. Okay. In every category?

13 A. Mm-hmm (affirmative).

14 Q. And when you -- you mentioned that there --  
15 the meeting with Stevenson and Cleveland about the  
16 review process. Was this specific to the Sand Hills  
17 program?

18 A. GNETS as a whole.

19 Q. GNETS as a whole.

20 A. Mm-hmm (affirmative).

21 Q. Okay. Is there ever a point where you-all  
22 meet with state DOE representatives to talk  
23 specifically about your -- about the strategic plan  
24 for your program specifically?

25 A. No, other than when we had our on-site visit

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1 my first year.

2 Q. Okay. And when does the on-site visit occur  
3 as part of that process?

4 A. Now, I'm not sure what the rotation is.  
5 They had just had a review the year before I came with  
6 the director who was here, but because they had a new  
7 director I think the practice is if you have a new  
8 director, you automatically get a visit that year. I  
9 want to say I think it's every three years that they  
10 do the rotation for the on-site visits.

11 Under the new process I'm not sure what that  
12 is going to look like other than we submit our  
13 evidence every year.

14 Q. Okay. And do you know what prompted there  
15 being a new process being put in place?

16 A. If I can recall -- I don't know the entire  
17 reason, but part of the reason was as they were  
18 reviewing the information that was being requested for  
19 the strategic plan and what was being requested for  
20 the GNETS plan, they decided that a lot of that  
21 information was repetitive.

22 And, you know, we asked them for two  
23 different -- it's our -- it's information of two  
24 different locations, and so they decided that it would  
25 be better if we just uploaded it every single year

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1 because we were maintaining it anyway from year to  
2 year. So we had to upload it this year.

3 MS. HAMILTON: Okay. I'm going to hand the  
4 court reporter -- let's see -- a document here in  
5 a moment. And have it marked as Plaintiff's  
6 Exhibit 204.

7 (Plaintiff's Exhibit P-204 marked.)

8 BY MS. HAMILTON:

9 Q. And this document is titled Sand Hills GNETS  
10 DIP 2020 to 2022.

11 A. Mm-hmm (affirmative).

12 Q. With the Sand Hills identifier 000754.

13 A. Mm-hmm (affirmative).

14 Q. Are you familiar with this document?

15 A. I am.

16 Q. Okay. What is a DIP?

17 A. Department Improvement Plan.

18 Q. Okay. And is this document connected to the  
19 strategic plan?

20 A. This is a document that's required for the  
21 Richmond County School System as being part of their  
22 program. And I aligned it to the strategic plan  
23 because these were things that we were already  
24 covering and they were already doing, and these were  
25 areas that we would be doing for our documentation for

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1 the plan for Richmond County.

2 Q. Okay. Was this documentation ever shared  
3 with the State of Georgia?

4 A. No, huh-uh.

5 Q. Okay. So to the extent that you-all had a  
6 department improvement plan from the Richmond County  
7 district what concerns were identified?

8 A. Concerns by?

9 Q. Well, let me take a step back. What is a  
10 department improvement plan?

11 A. So each year the different schools and  
12 departments or programs turn in a plan that we're  
13 going to follow for the school year; these are the  
14 areas that we identified as areas of need, and these  
15 are the areas that we're going to work on.

16 And so that's what this one was. And then  
17 we come back midyear and do a midyear check, and then  
18 at the end of the year we do an end of the year check.

19 Q. Okay. So is this similar almost to like the  
20 State DOE strategic plan for your creating your, like,  
21 your own assessment of your program's performance, or  
22 is this identifying deficiencies?

23 A. Both.

24 Q. Okay.

25 A. Because we do a needs assessment, what areas



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1 do we need to work on he had, and that's what we do in  
2 the plan. But it's also so we're not replicating work  
3 doing what's required in our strategic plan, and also  
4 working on those things that's going to improve our  
5 program. So I want to say that they are aligned.  
6 That was the whole purpose of doing it that way, so  
7 they would be aligned.

8 Q. Were there any deficiencies with the program  
9 that were identified through this process?

10 A. Let's see. This one is an older one. So  
11 let's see.

12 Q. During this time period.

13 A. I'm looking through it. One of the things  
14 that we had to do for the State was rank our programs  
15 or rank our areas in need.

16 Goal number four was one of those areas that  
17 I identified earlier that we really wanted to bring  
18 our community stakeholders back in. Because of COVID  
19 we lost some of them. So that was one.

20 And then instructional academic support was  
21 identified as number two. And that one was identified  
22 as an area of need because we want to make sure that  
23 we were providing support to all of our teachers who  
24 are coming back in from, or coming in from an  
25 alternative teaching track.

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1 MS. HAMILTON: Okay. I'm now going to hand  
2 the court reporter a document to be marked as  
3 Plaintiff's Exhibit 205.

4 (Plaintiff's Exhibit P-205 marked.)

5 BY MS. HAMILTON:

6 Q. And this is a document that's titled GNETS  
7 Strategic Plan Improvement Plan Fiscal Year 2020 with  
8 the Sand Hills identifier 000757.

9 A. Mm-hmm (affirmative).

10 Q. Are you familiar with this document?

11 A. Mm-hmm (affirmative). I've seen it.

12 Q. Okay. And we had received this in response  
13 to the subpoena from your program, but the most recent  
14 one we received covers fiscal year 2020.

15 A. Mm-hmm (affirmative).

16 Q. What is this document?

17 A. So you had mentioned earlier about the  
18 strategic plan that the State provides along with the  
19 rubric and the self-assessment.

20 So this one was actually created by the  
21 former director in May of 2019 to be implemented for  
22 fiscal year 2020. And so this was a plan that was  
23 followed.

24 If you look up at the top, one of the things  
25 that the program had to do is identify the areas of

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1 need or whether what priority those different areas  
2 are. And so that's what the highlighted areas are.

3 Rank on scale of six -- one to seven area --  
4 I think there is seven areas in this program. And  
5 then it also includes the types of evidence that would  
6 be submitted to show how those areas are being  
7 addressed.

8 Q. And would you have been -- you started in  
9 January 2020; correct?

10 A. Mm-hmm (affirmative).

11 Q. Would you have been implementing kind of  
12 what the proposed plan was during the latter part of  
13 the 2020-2021 school year?

14 A. To the extent that we were virtual I was  
15 implementing. Because we were virtual starting that  
16 March through the rest of that school year for 2020.

17 Q. And then did you do a similar strategic  
18 improvement plan for the fiscal year '21?

19 A. I did one for '23.

20 Q. Okay. You didn't have to do one for '21 or  
21 '22?

22 A. There wasn't, huh-uh (negative).

23 Q. And is that consistent with the timeline you  
24 were sharing earlier about every two years?

25 A. Mm-hmm, yes.

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1 Q. Since you've been a GNETS director for the  
2 Sand Hills program have you ever not received an  
3 operational score or a rating score from the State?

4 A. No.

5 Q. Do you find the strategic plan process to be  
6 helpful?

7 A. Actually, I do. It kind of gives you some  
8 areas that you as a director you would want to focus  
9 on to ensure that you're meeting the needs of the  
10 program, as well as the needs of the students.

11 It kind of gives you -- you don't want a  
12 plan that's got 50 things on it, and sometimes we'll  
13 say if you have more than three items on a plan, it's  
14 probably too much. But the six items that we have I  
15 think are very appropriate, and easy to -- not easy to  
16 implement, but easy to monitor whether or not we're  
17 moving forward with what's required.

18 Q. Is there anything you would improve or  
19 change about the process?

20 A. Right now I can't think of anything.

21 Q. That's fine. And as you were talking about  
22 the strategic plan you also started to list out some  
23 of the therapeutic services and contracts that you  
24 have.

25 A. Mm-hmm (affirmative).

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1 Q. I want to revisit that. And you listed a  
2 lot of the services earlier. So what I'll actually do  
3 is focus on the providers.

4 MS. HAMILTON: I'm handing the court  
5 reporter another document that's going to be  
6 marked as Plaintiff's Exhibit 206.

7 (Plaintiff's Exhibit P-206 marked.)

8 BY MS. HAMILTON:

9 Q. All right. And this document was provided  
10 to us in response to item 19 --

11 A. Mm-hmm (affirmative).

12 Q. -- by the Sand Hills program in response to  
13 the United States subpoena using the identifier 002812  
14 on the first page.

15 Do you recognize this document?

16 A. I do.

17 Q. Okay. What is it?

18 A. It's a list of the service providers who  
19 come into the schools, the Sand Hills program,  
20 supervised support for the students.

21 Q. Okay. I'd like to walk through each of  
22 these providers and just hear more from you about what  
23 exact services they provide.

24 The first one here says Transitional Family  
25 Services.

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1 A. Mm-hmm (affirmative). So Transitional  
2 Family Services is a community program that actually  
3 comes into the schools to provide support.

4 And this year I have actually realized that  
5 they provide a lot of services under Transitional  
6 Family Services; family training, parent training,  
7 staff training. They refer students to additional  
8 counseling. But they come on site for those students  
9 who are participating in GNETS.

10 Q. How many students benefit or receive their  
11 services?

12 A. I don't think I'm going to be able to give  
13 you an exact number.

14 So what we did, we went in and we have a  
15 sign-in book that we pull and identified all of the  
16 different agencies, because they have to sign in. But  
17 I know my last year we had at least two students out  
18 at the Thomson site who had Transitional Family  
19 Services because they came on site.

20 And then in the Richmond County School  
21 System I can identify one student I know who had  
22 Traditional Family Services because the counselors  
23 came on site for him.

24 Q. So at least two students?

25 A. Three. Two in Thomson and one in Richmond.

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1 Q. Okay. And what is the source of funding for  
2 this program again?

3 A. Traditional Family Services?

4 Q. Mm-hmm (affirmative).

5 A. I'm not sure how they are funded, but it's  
6 not -- it's outside of the school system. So these  
7 are community agencies that are providing services,  
8 but they come in on school and provide those services.

9 Q. Okay. Do you know if they are contracted  
10 through the Regional Community Service Board?

11 A. They could be. I know that you can make  
12 referrals to the Department of Behavioral and Mental  
13 Health. They'll come out. And the Community Mental  
14 Health may also do some things with them as well.

15 Q. Okay. You also have SOTO ALG listed here.  
16 What is that?

17 A. That's an agency that comes in and provides  
18 support, too. They were coming in to provide support  
19 to one student in our program.

20 And most of these referrals are referrals  
21 for people within the community. Maybe the parent  
22 reached out and contact them and they're coming on  
23 site to serve the students.

24 Q. Are you involved with coordinating the  
25 services?

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1           A.     Sometimes I'm not -- well, sometimes I am.  
2     Like with Transitional Family Services, they might  
3     come on site and say, hey, we want to sit and talk to  
4     you-all about when's the best time to come out and  
5     meet with the students.

6           I know specifically for the students in  
7     Richmond County they did come in. In addition to  
8     making arrangements for them to come on site, we had  
9     to also make arrangements for a staff member to be  
10    available. So we'll have discussions like that to  
11    make the students feel more comfortable when they were  
12    participating in a session.

13          Q.     Okay. You also have the Georgia Crisis and  
14    Access Line?

15          A.     Mm-hmm (affirmative). We've had parents who  
16    have had to call and reach out to them because they  
17    had a child in crisis, either the child was -- excuse  
18    me -- more than likely threatening suicide.

19          Q.     Do you coordinate those services and  
20    supports directly, or the parents reaching out  
21    independently?

22          A.     I can reach out, but the parents have to  
23    ultimately follow up and agree to it.

24          Q.     How frequently were their services utilized  
25    this past year?



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1 A. I'm going to say we probably had three  
2 students in Richmond who used the Georgia Crisis Line.  
3 We didn't have any in Thomson.

4 Q. And did you facilitate those services in  
5 those situations?

6 A. We gave the parents the contact information  
7 for them to call. For one of the parents, she was a  
8 little hesitant. So I actually did contact them to  
9 find out what steps do we have to take in order for  
10 the parents to move forward with getting some  
11 additional support outside of through their services.  
12 Again, it fell back on the parent has to do it.

13 Q. And your program is not providing funding  
14 for any additional --

15 A. Huh-uh (negative).

16 Q. -- support in connection with that?

17 A. Not for them, no.

18 Q. So in the column to the right of this these  
19 same programs are listed, but then it also says Voc  
20 Rehab?

21 A. Mm-hmm (affirmative).

22 Q. What services do they provide?

23 A. So Vocational Rehabilitation Services  
24 provides transition for when a student leaves the  
25 school system, whether they need support finding maybe

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1 a job, whether they need support, if they are going  
2 off into a technical school or college or university,  
3 what is -- what types of services do they need in  
4 order to transition successfully once they leave our  
5 school system. And they work with all of our students  
6 regarding the disabilities.

7 So we might have some students with  
8 significant cognitive disabilities. They help them  
9 maybe shelter employment, do they need help with maybe  
10 finding a -- the parents are ready to say, hey, I  
11 think they are ready to go off like -- I think Warm  
12 Springs. They provide assistance with that as well.

13 And Warm Springs is a place where some of  
14 our students with developmental disabilities can go  
15 and live on campus and experience like a college  
16 experience. I think those programs are about two  
17 years long.

18 Q. Okay. For voc rehab I know you said they  
19 can help all of your students. How many of your  
20 students this past school year were receiving  
21 assistance or services?

22 A. All of our high school students in both  
23 sites received -- had access to the services. We had  
24 started working with them in order to get the virtual  
25 job shadowing, so all of our students were able to

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1 participate in that. Let's see.

2 As far as any types of placements through  
3 voc rehab, we didn't have any who did that.

4 Q. And you mentioned Warm Springs?

5 A. Mm-hmm (affirmative).

6 Q. How many students took advantage of --

7 A. I didn't have any in this program who took  
8 advantage of Warm Springs.

9 Q. Okay. And then also there is something  
10 listed here called Still Waters?

11 A. Mm-hmm (affirmative). We had some students  
12 to participate with Still Waters, which is a  
13 counseling agency that provides counseling for  
14 parents, counseling for students. Their physician's  
15 on site if they need medication or assistance with  
16 medication management.

17 Q. Do they provide -- you said they do provide  
18 assistance on site --

19 A. Yes.

20 Q. -- through the GNETS program?

21 A. Mm-hmm (affirmative). They come on site.

22 Q. And you said medication management as well?

23 A. Mm-hmm, mm-hmm (affirmative).

24 Q. How many students utilized their services  
25 this past year?

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1 A. I don't think I had anybody come on site for  
2 Still Waters for FY '21-'22.

3 Q. Do you recall if they came on the prior  
4 school?

5 A. They -- yes, did come on the prior school  
6 year. And I want to say it was two students in the  
7 Richmond County School System who had support through  
8 Still Waters.

9 Q. And from a coordinating standpoint, are  
10 you-all coordinating that?

11 A. No. Typically if the parents have already  
12 reached out, that coordination is done by the parents.  
13 These people are coming on site to provide the  
14 services to the students.

15 Q. Okay. And then I want to skip to the next  
16 page at the very bottom, letter "e". It says: "Any  
17 actions taken to implement a System of Care Plan that  
18 could facilitate collaboration across agencies"?

19 A. Mm-hmm (affirmative).

20 Q. Earlier you had referenced LIPT and also  
21 CHIDS, I believe?

22 A. Mm-hmm (affirmative).

23 Q. So returning back to LIPT, can you speak a  
24 bit more about what your -- what the system of care  
25 plan looks like and what your involvement is there?

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1           A.     So for LIPT we can turn in a referral  
2 packet. And with that referral packet, the team will  
3 meet. And typically the team includes a -- would be a  
4 social worker from our GNETS program and they have  
5 agencies representatives -- represented from mental  
6 health, social work, any type of community resources  
7 that might be available.

8                 Based on what's in the referral, those  
9 agencies will be sitting at the table, and they  
10 actually develop a plan of care to address the student  
11 needs. It might be mentoring programs, it might be  
12 parent training, it might be, you know, getting them  
13 involved with some type of extracurricular activity  
14 outside of school; maybe a child showed an interest in  
15 martial arts or something like that, and they work up  
16 that plan.

17                Again, if the child might be in need of  
18 medication or medical care, all those people, all of  
19 those people are sitting at the team.

20                The parents are definitely involved in that  
21 LIPT process. There is a section that if we don't get  
22 the parent input, we can't even move forward with  
23 that. So they really want the parents at the table  
24 with that because a lot of what has to take place will  
25 require the parents to follow up.

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1 Q. Okay. And how many students this past  
2 school year had plans that were developed as part of  
3 what the LIPT team --

4 A. So for FY '21-'22, we turned in three LIPT  
5 referrals.

6 Q. Mm-hmm (affirmative).

7 A. I'm sorry. 19 -- not '19-'20. '20-'21 we  
8 turned in three LIPT referrals. And for '21-'22 we  
9 turned in two LIPT referrals.

10 Q. Okay. And for the referrals that were made,  
11 did all of those students then have a plan that was  
12 developed to serve them?

13 A. So for FY '21-'22 I'm not really sure what  
14 happened with those referrals for those students  
15 because there was a disconnect between who the LIPT  
16 contact person was, and so we turned those in later in  
17 the school year. They may pick those up at the  
18 beginning of FY '23.

19 For those students in FY '20-'21 we were  
20 able to develop a plan for those students and the  
21 parents and recommend what we needed. One of the  
22 students moved away, though. So her full plan didn't  
23 get carried out.

24 Q. Okay. And then also at the top of the page  
25 it says are there "any contracts or service agreements

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1 with care management organizations or community  
2 service providers."

3 And you list here Dr. Donna Londino, who you  
4 mentioned earlier during the deposition as well.

5 A. Mm-hmm (affirmative).

6 Q. Can you explain to me what the -- what  
7 services are provided through Dr. Londino?

8 A. So she comes out with her interns twice a  
9 month. They do classroom observations. They provide  
10 feedback to the teachers on some of the things they  
11 might observe. They make recommendations.

12 They're available to accept direct referrals  
13 from the parents. So that kind of cuts down on some  
14 of that wait time that some of our students might  
15 experience if they go outside of her program.

16 She also provides professional learning for  
17 the staff on different types of disability, mental  
18 health disorders or disabilities. And she also this  
19 past year provided some virtual training for our  
20 parents.

21 Q. And how long is that agreement in place for?

22 A. I want to say it was in place before I got  
23 here. My first year here, which was second half of  
24 that 2020 school year, she didn't come on site. And  
25 then FY '20-'21 we had an agreement, but we weren't

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1 able to implement it because we were closed so often.  
2 But '21-22 she followed that. She came every month  
3 twice a month to both locations.

4 MS. HAMILTON: Okay. I'm handing the court  
5 reporter a document to be marked as Plaintiff's  
6 Exhibit 207.

7 (Plaintiff's Exhibit P-207 marked.)

8 BY MS. HAMILTON:

9 Q. And this document is titled Program Letter  
10 of Agreement between Medical College of Georgia Child  
11 and Adolescent Psychiatry Fellowship Program.

12 A. Mm-hmm (affirmative).

13 Q. And the County Board of Education of  
14 Richmond County on behalf of the Sand Hills GNETS  
15 program.

16 A. Mm-hmm (affirmative).

17 Q. And it's stamped 002804.

18 Do you recognize this document?

19 A. I do.

20 Q. Okay. And how are you familiar with it?

21 A. This was the agreement that was created by  
22 Dr. Londino so that we could enter an agreement for  
23 her to come on site and provide support for our  
24 students.

25 Q. And it looks like here in this second



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1 paragraph it says this agreement is "effective from  
2 July 26 of 2021, and will remain in effect for five  
3 years" --

4 A. Mm-hmm (affirmative).

5 Q. -- "or until updated, changed, or  
6 terminated."

7 Is that consistent with your understanding?

8 A. Yes.

9 Q. Okay. And then if you turn to 002805, this  
10 is setting out what the fellows under the supervision  
11 of Dr. Londino are able to do in your -- when they  
12 come to your program.

13 A. Mm-hmm (affirmative).

14 Q. And I guess just to confirm here in the  
15 second sentence it says: "Fellows in training are not  
16 allowed" -- sorry. This is on 002805.

17 A. I see it.

18 Q. "Fellows in training are not allowed to  
19 provide direct clinical care to students at the," and  
20 then it's blank.

21 Can you elaborate on what that means? So  
22 are they allowed to provide direct clinical care to  
23 students on site?

24 A. They are doing observations and providing  
25 feedback to the teachers on some things that they can

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1 do with the student.

2 Q. Okay.

3 A. And then that professional learning about  
4 different topics that they might have expressed an  
5 interest in.

6 Q. Okay. But they are not allowed to provide  
7 direct care inside?

8 A. Huh-uh. And you don't even release it. You  
9 don't even release the students out to staff that were  
10 coming in under them.

11 Q. Okay. Returning back to Exhibit 206 on the  
12 second page.

13 A. Mm-hmm (affirmative).

14 Q. And this is on the second page, 002813.

15 A. Okay.

16 Q. There is a note here on the second row. So  
17 the request had said any "information relating to  
18 unmet needs for therapeutic services, including any  
19 waitlists or gaps analyses."

20 Your response says: "The needs of students  
21 are evaluated. The students have within out of school  
22 for the past 12 to 16 months."

23 A. Mm-hmm (affirmative).

24 Q. "FY '22 has been the first year back face to  
25 face since the pandemic in March 2020."

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1 A. Mm-hmm (affirmative).

2 Q. Can you explain how that's relevant in  
3 connection with the question here about any unmet  
4 needs for services?

5 A. When we did this one I didn't really know  
6 what the unmet needs were because we had been out of  
7 school for that amount of time. And it was -- and  
8 even when we came back, it was not consistent.

9 Q. Okay. Are there any therapeutic services  
10 that you wish you could offer to your students but are  
11 not able to right now?

12 A. And we kind of did this over the course of  
13 the year. This summer was ongoing services for the  
14 students outside of school year for consistency  
15 purposes.

16 I was able to fund that social emotional  
17 learning, we did home visits over the summer up  
18 through June 30th. But even something that would last  
19 throughout the summer, I think that would be helpful  
20 for the students.

21 Q. Is there anything else that would be  
22 beneficial in terms of therapeutic services for your  
23 students that you don't currently have?

24 A. Over the course of the two-and-a-half years  
25 I did notice that -- and I don't even know that it's

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1 anything that I can control is that parent support  
2 piece. A lot of our parents are in crisis, and we  
3 give them information about services that could be  
4 available to them.

5 We've had parents who are homeless and  
6 dealing with social emotional things on their own that  
7 impact the students. Having some type of support in  
8 place for the parents, if that was something I could  
9 control I would put that in place for them.

10 Q. Do you-all provide family counseling --  
11 sorry -- family counseling or other family services?

12 A. We make re- -- we give them information for  
13 referrals, but as a program we don't provide that.

14 Q. And who decides what therapeutic services  
15 will be provided at your GNETS program?

16 A. It's a combination. One of the things I  
17 would say, the first person who might make  
18 recommendations would be the student's classroom  
19 staff. The teacher or the paraprofessional, they can  
20 make recommendations, or they can even make referrals  
21 to our social worker and our counselor.

22 Once our social worker and our counselor  
23 start meeting with them, they can identify the needs  
24 that the students might have based on a therapeutic  
25 basis and make referrals to outside agents. Well, let

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1 me say they can't make referrals. Share the  
2 information with the parents to make the referrals to  
3 outside agencies. The ones that we can make direct  
4 referrals to would be the Chance and the LIPT program.

5 And then we also make referrals through  
6 Dr. Londino, who sees there's a need, we'll give the  
7 parents information about her program as well.

8 Q. Are you familiar with the APEX program?

9 A. I am.

10 Q. What is APEX?

11 A. I don't know what APEX stands for, but it's  
12 a program designed to address the mental health needs  
13 of students. And it's a special grant that's afforded  
14 to different school systems in the state of Georgia.

15 Richmond County has had the grant. Now,  
16 they are not on site for GNETS, but if there is a  
17 student who would need direct support, we can make the  
18 referral through Student Services for them to receive  
19 support.

20 Q. So just to make sure I understand, that  
21 student participating in your GNETS program --

22 A. Mm-hmm (affirmative).

23 Q. -- can participate in the APEX program?

24 A. Yes, mm-hmm.

25 Q. And then you also said you would be able to

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1 make referrals through the Richmond County Student  
2 Services Department?

3 A. Yes, mm-hmm.

4 Q. And what's the nature of the services that  
5 students can receive through APEX?

6 A. I'm not sure of the specific types of  
7 services, but I do know there are services related to  
8 mental health.

9 Q. How many students have been able to take  
10 advantage of that in the last two school years?

11 A. I referred two students, and but those two  
12 students were already receiving outside services. So  
13 I'm not sure if they got continued support. We did  
14 have some people come on site to kind of talk to us  
15 and talk to the students. But we did make two  
16 referrals last year.

17 Q. And if a student receives services through  
18 APEX, would that be reflected in their IEP or any  
19 other documentation?

20 A. It has not been. Well, not in their IEP.  
21 We would reflect it someplace else if they received  
22 continued support, especially if that person was  
23 coming on site, they would actually sign in and  
24 indicate who -- which student they were coming to see.

25 MS. HAMILTON: All right. I am handing the

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1 court reporter a document to be marked as  
2 Plaintiff's Exhibit 208.

3 (Plaintiff's Exhibit P-208 marked.)

4 BY MS. HAMILTON:

5 Q. And this is an email from yourself to a  
6 number of GNETS directors dated December 1st, 2020  
7 with the subject line of APEX Participation.

8 And this was actually a document we'd  
9 received from the State of Georgia and their  
10 production stamped GA00963618.

11 A. Mm-hmm (affirmative).

12 Q. Do you recognize this document?

13 A. I do.

14 Q. And this is an email that you sent to  
15 various GNETS directors?

16 A. It is.

17 Q. And it looks like here you mentioned that  
18 one of the systems that you were working with was  
19 participating in APEX, and you wanted to include  
20 students?

21 A. Mm-hmm (affirmative).

22 Q. Is that the Richmond County --

23 A. Mm-hmm (affirmative).

24 Q. -- that we were talking about?

25 A. It is.

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1 Q. What made you reach out to the GNETS  
2 directors?

3 A. When we were participating in a meeting,  
4 they mentioned APEX. And they also -- and it may have  
5 been -- trying to think if this was right after I had  
6 my review, that somebody from the -- that  
7 Ms. Cleveland might have asked me were my students  
8 participating in APEX, and was I familiar with APEX.

9 At the time I was not, and that's why I  
10 reached out to find what other directors were doing as  
11 far as accessing information.

12 Once I found out the contact information, I  
13 contacted the director of Student Services in Richmond  
14 County at the time to find out what this process would  
15 look like. He and I had made arrangements on what we  
16 would do to ensure that the students got included, and  
17 we finally came up with a plan when we returned back  
18 in FY '22.

19 So the plan was if I had any students who  
20 need to participate in the program that I would go  
21 through Student Services to get them included.

22 Q. Okay.

23 A. Mm-hmm (affirmative).

24 Q. And when you sent this email, did any GNETS  
25 directors respond?



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1           A.    I don't know. I have to go back and check.  
2   Because there is another email that I sent to our  
3   Student Services director because I figured if anybody  
4   would know he would. So I'd have to go back and  
5   verify whether or not I got a response back.

6           Q.    I guess, belatedly, do you recall if in  
7   reaching out to the GNETS directors you received any  
8   feedback that other programs were, in fact, using the  
9   APEX?

10          A.    I can't recall whether or not I did or not.  
11   I'd have to look at my email and get back to you.

12          Q.    All right. Are you familiar with the  
13   acronym MTSS?

14          A.    Mm-hmm (affirmative).

15          Q.    Okay. What does that stand for?

16          A.    Multitiered systems of support.

17          Q.    Okay. And how would you define that?

18          A.    I would define that as during the school  
19   system what types of supports do students need in  
20   order to have their needs met. It's not just  
21   academic. So what do all students need in order to --  
22   and as you go up, the higher you go up the tiers, the  
23   more support you might need, and that support is  
24   provided based on where you are.

25                So there is a level of support that all

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1 students get. And I'm going to use the old school  
2 terms, the support team, and RTI response to  
3 intervention. So Level 1 would be what everybody  
4 gets. Level 2 would be what everybody gets in  
5 addition to what small groups might get. And then the  
6 next level would be maybe more individualized support  
7 that a student might need. And it's more intense.  
8 It's more frequent based on the needs of the student.

9 Q. Okay. Are you-all using RTI currently?

10 A. We don't use it specifically for our program  
11 because our students have individualized educational  
12 programs. So any types of needs or supports that they  
13 would need outside of what we provide, we would go  
14 through the IEP team process to get that done.

15 Q. And just for the record, what does "RTI"  
16 stand for?

17 A. Response to intervention.

18 Q. Okay. So from the academic standpoint, is  
19 there a tiered support in services system or framework  
20 that you currently use?

21 A. We do.

22 Q. Okay. What is that?

23 A. So earlier I mentioned we have the  
24 intervention notebooks that we keep for our students,  
25 and the front side of the notebook includes the

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1 behavior -- would be the pyramid that we have for  
2 behavior. And then the back side of the notebook has  
3 the pyramid that we use for academics. We use their  
4 IEP goals and objectives to make sure that they're  
5 collecting progress monitoring information on that.

6 We use their -- whatever data that we said  
7 that we were going to use to check progress from the  
8 IEP, we use that.

9 We use our i-Ready test scores for our  
10 i-Ready diagnostic assessments from reading and math.

11 If the teacher has TeacherMade test, we  
12 might use that. We might use observations as well to  
13 identify where in the tiers the child might be as far  
14 as academics.

15 If the child is not making progress, there  
16 is some interventions that are listed for the teacher  
17 to implement for those particular students and for the  
18 students have the opportunity to go up the pyramid as  
19 well as come back down the pyramid, based on their  
20 needs at the time.

21 Teachers are monitored throughout the year,  
22 but every quarter they have to do what's called a  
23 quarterly summary report. And the quarterly summary  
24 report is what we use to look at academics, behavior.  
25 We look at those, all of those things that I just

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1 said, to provide a summary for where the student is,  
2 and identify what those needs are for the student. So  
3 we do that every nine weeks for each student in the  
4 program.

5 Q. Okay. What accountability and oversight  
6 measures do you have in place to ensure that this  
7 process is implemented the fidelity?

8 A. Okay. So we have lesson plan checks we do  
9 every two weeks. We have what we call look fors. And  
10 the look fors would be the admin team, administrative  
11 team, going into the classes throughout the day,  
12 monitoring instruction, looking for lesson plans, kind  
13 of -- it's not an evaluation but, it's just going in  
14 to see what's going on in the classroom. So we do the  
15 look fors.

16 We have a teacher accountability document  
17 that we complete monthly for our staff. And everybody  
18 has one, the teachers have one, the parents have one,  
19 the coordinators have one, social workers and  
20 counselors will have one for FY '23.

21 We also review the quarterly report so the  
22 intervention notebooks are checked four times a year,  
23 so they are checked at the end of every quarter.

24 Q. Okay. And does the State of Georgia provide  
25 any sort of guidance or support or oversight of the

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1 academic components of your multitiered system?

2 A. Absolutely. One of the things they do is  
3 initially when I came on board we had the focused --  
4 excuse me -- on site review. They looked at our  
5 documents, talked about our documents. We had to turn  
6 in samples of what we were using.

7 We have to turn in samples of the IEP. We  
8 turned in samples of our intervention notebooks as  
9 well.

10 We turned in copies of our pyramid, the one  
11 for behavior and the one for academics.

12 Let's see. So that was for the review, and  
13 now with us doing it annually we'll turn those in  
14 every year.

15 Q. And who from the State is involved in that  
16 process of looking at the academic materials that you  
17 just listed?

18 A. Vickie Cleveland, LaKesha Stevenson would be  
19 the ones that I would say. Those are the ones I get  
20 feedback from.

21 Q. Okay.

22 A. And if something is missing, they definitely  
23 let you know.

24 Q. And do you get feedback on these academics  
25 outside of the on site review process?

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1 A. I have not up to this point.

2 Q. Do they provide training on -- or does the  
3 State of Georgia provide any training on academic  
4 supports or resources for students in your program?

5 A. Oh, as a matter of fact, one of our sessions  
6 last year and this year, I think I had mentioned  
7 earlier, is that we have a lot of outside people  
8 coming into our GNETS meetings.

9 Q. These are the monthly meetings?

10 A. Mm-hmm (affirmative).

11 Q. Okay.

12 A. And they had people coming in talking about  
13 the supports that were available, the resources that  
14 were available. They have a lot of virtual trainings  
15 that the staff can participate in.

16 I have not seen a lot that have already been  
17 recorded through for professional learning pieces.  
18 I'm trying to think. But yes, they do provide  
19 support.

20 Q. Okay.

21 A. And professional learning for that.

22 Q. All right. And is progress -- so for  
23 students, is demonstrating progress through this  
24 process academically a determining factor in their  
25 ability to access transitioning back to their GNET

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1 school?

2 A. No.

3 REPORTER: I'm sorry. "Back to" their what?

4 Q. Back to their general -- GNET school.

5 All right. And then for behavior, do you  
6 also use a framework I believe is it PBIS?

7 A. Mm-hmm (affirmative).

8 Q. Okay. What is PBIS?

9 A. Positive behavior interventions and  
10 supports.

11 Q. And how do you use PBIS in your program?

12 A. Oh, goodness. So we are PBIS school and so  
13 when you walk in, you'll see our STAR matrix. You'll  
14 see information about the expectations for students  
15 walking in the hallway, bus expectations, classroom  
16 expectations, lunchroom expectations, you'll see them  
17 posted in the classrooms.

18 The students should be able to tell you what  
19 all of those different things mean. The first three  
20 weeks of school we'll actually be doing lessons on --  
21 with the students on PBIS and what the expectations  
22 are. For FY '23 we've added a fifth area, which is  
23 restorative. So that will be updated on our new  
24 matrix.

25 So we teach it to our students. We have

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1 expectations in the hallway. Students receive rewards  
2 as part of PBIS, and they have consequences, too, and  
3 it's tied to our level system as well.

4 Q. Okay. What does Tier II support through  
5 PBIS look like in your program?

6 A. Okay. We're finalizing that piece for FY  
7 '23.

8 Q. Did you have it previously?

9 A. I think we had it. We -- let me back up.  
10 We had it on our matrix. When I say we're finalizing  
11 it, we've made some enhancements to what we have in  
12 place that will be more detailed for teachers to know  
13 the process, when to make referrals, how to make  
14 referrals, what to expect. And so we're kind of  
15 expanding our Tier II piece.

16 So that would look like social worker,  
17 counselor, whatever our therapeutic service provider  
18 is coming in, working with the students, or having the  
19 students come out to them. It might be a student  
20 might need more check-ins with their preferred person.  
21 So those are some of the things that we're doing for  
22 that.

23 Q. Okay. And what did it look like before?

24 A. It was -- it looked the same, but it's going  
25 to be spelled out clearer to the staff.



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1           One of the things that we realize is that  
2           everybody didn't always understand what that process  
3           looked like on how you make the referrals, what are  
4           they are supposed to expect for a child who's in Tier  
5           II, as well as a child who's in Tier III.

6           They were so used to having the child come  
7           out of the classroom that they didn't always recognize  
8           that we were providing support in class for that.

9           Q.    Okay. And what about Tier III? Do you-all  
10          implement the Tier III framework of PBIS in your  
11          program?

12          A.    We do, mm-hmm.

13          Q.    What does that look like, and how is that  
14          different from Tier II and Tier I?

15          A.    So -- I'm focusing on behavior and students  
16          in need, so that's more individualized. Those  
17          students for Tier III are pulled out. They might have  
18          15 to 30 minutes where they are meeting with -- and if  
19          they need more time than that -- where they're meeting  
20          with a counselor a social worker.

21                It might be that we need to make some  
22          referrals for outside agencies based on what the --  
23          what comes out of that meeting, we may have to have  
24          IEP meetings for the students to look at adding some  
25          additional services outside of what we're giving them

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1 on their IEP at that time.

2 Q. Are you required to have -- to implement the  
3 PBIS framework by the State of Georgia?

4 A. I can't answer whether or not we are  
5 required. I can say that I think that it's the  
6 expectation that we're doing that. I have never heard  
7 it being required. But I definitely know that most of  
8 the programs are using -- I don't know one that's not  
9 using PBIS as part of the framework.

10 Q. Okay. And what support, training or other  
11 guidance does the State Department of education  
12 provide in connection with PBIS?

13 A. I don't want to sound like I'm complaining.  
14 But we have so much support for PBIS. There  
15 is a whole web page on PBIS, there are pamphlets,  
16 there are brochures, handbooks. We get -- there are  
17 recorded sessions for PBIS. There are a weekly  
18 meetings for PBIS, monthly meetings for PBIS. There  
19 are technical assistance that's provided for PBIS. So  
20 we get a lot of support from the State regarding PBIS.

21 Q. Are there any other behavior management  
22 systems where you think it would be helpful to get  
23 additional resources from the State besides PBIS?

24 A. Well, I always just feel like the more  
25 information you have, regardless of whether you're

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1 implementing it or not, the better. So it wouldn't  
2 hurt -- for my instance, it wouldn't hurt to have  
3 additional information.

4 Q. And I just a clarification question. For  
5 your students who are receiving Tier III support --

6 A. Mm-hmm (affirmative).

7 Q. -- do they all are they required to have a  
8 current behavior intervention plan and FBA?

9 A. All of our students have that, mm-hmm.

10 Q. And are crisis intervention plans included  
11 for students who may cause injury to themselves or  
12 others?

13 A. Injury to themselves. If there are any type  
14 of dangerous activity, if they like to elope or leave,  
15 and leave the building, we have crisis intervention  
16 plans for them as well.

17 Q. Okay. Do you implement trauma-informed  
18 care?

19 A. We do.

20 Q. Okay. What does that look like at your  
21 site, and what exactly is it?

22 A. So we do have students who have experienced  
23 trauma in our program, and so some of the things that  
24 we have to do is we provide professional learning to  
25 our teachers and our staff on what trauma is.

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1 We provide support on how do you address  
2 trauma in the classroom, and how does that impact  
3 students in the classroom, providing information on  
4 strategies that students can use. We do things like  
5 meditation and mindfulness. Those are some things we  
6 are incorporating.

7 For students who might be in -- we have one  
8 I'm thinking of right now, because of the trauma that  
9 he's experienced when he has meltdowns, the types  
10 of -- we might do LSCI with that student, and then in  
11 the classroom, and then pull that child out for  
12 additional supports through the social worker or  
13 counselor. And this child's trauma is very extensive,  
14 so he has outside agencies who work with him as well.  
15 And so we'll have -- we'll contact his outside agency,  
16 as well as his grandmother to let her know what's  
17 going on with him.

18 Basically being very sensitive to those  
19 students who have experienced trauma and actually some  
20 of the adults who have experienced trauma as well.

21 Q. Does the State Department of Education  
22 provide any, again, training, support or resources  
23 connected to trauma-informed care to your program?

24 A. They do provide some information about  
25 trauma-informed care. When I first came on site -- I

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1 mean, excuse me. When I first became the director for  
2 the program the very first meeting that I went to  
3 seven days later was in Macon. And we did a large  
4 presentation on what trauma-informed care looked like.  
5 They had somebody who came in from outside of the  
6 state to present to us. And I can't remember if that  
7 person was face to face or virtual right now. But  
8 they do provide us with information about that. And  
9 so I'm going to go on record as saying I don't want to  
10 make it seem like the State hasn't been providing  
11 support to us in those areas. Some of the delays or  
12 the hindrances are really because we've had some  
13 challenges with scheduling things face to face. I'll  
14 just leave it at that.

15 Q. So you implement social emotional learning  
16 in your program?

17 A. Every day.

18 Q. Okay.

19 A. Multiple times a day in some cases.

20 Q. And what does that look like at your site?

21 A. So one of the requirements for the teachers  
22 is to ensure that they are social emotional learning  
23 lesson plans regarding different topics that they're  
24 going to talk about for the students weekly or daily.

25 We might also for next year one of the

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1 requirements for the social worker and the counselor  
2 is that they have to go in, each one of them, and  
3 provide additional social emotional learning lessons.  
4 The teachers have access to social emotional learning  
5 curriculum through Sanford Harmony and Panorama.

6 We did midyear -- we do beginning of the  
7 year, midyear, and end of the year progress monitoring  
8 on those programs, or surveys that the students  
9 complete on the types of social emotional learning  
10 that they have received throughout the course of the  
11 year.

12 Q. And who reviews the results of the progress  
13 monitoring?

14 A. They go to Student Services. Student  
15 Services shares the results with us about what the  
16 students are saying.

17 Q. From the School District?

18 A. Mm-hmm (affirmative).

19 Q. Does the State Department of Education  
20 provide any training, support or resources in  
21 connection with social emotional learning that you're  
22 doing?

23 A. No.

24 Q. Okay. Do you implement restorative  
25 practices?

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1           A.     Yes.   That was a big initiative for FY '22.  
2   We spent a lot of time working on restorative  
3   practices.   That's the reason why our matrix is going  
4   to change, to add restorative in there.

5                 So we've been working very closely to  
6   implement restorative practices, social contracts in  
7   our school.   Each class has their own social contract.  
8   The staff have a social contract.   We all sign off on  
9   it, everybody gives input on what they think it should  
10   look like, how do you address the needs of a student  
11   in a restorative way, how do we restore relationships  
12   with the staff in an appropriate way, especially  
13   trying to restore harm.

14                We do restorative circles.

15                We do check-ins with the staff.   We do  
16   check-outs with the staff.   We do check-ins with the  
17   students.   We do check-outs with the students.

18                And I tell people all the time if I could  
19   keep -- if I had to keep one thing out of the  
20   restorative practices it would be those  
21   check-ins/check-outs with the staff and the students.  
22   You gain so much more insight on who you're working  
23   with, as well as what's going on with the kids.   You  
24   can engage on what's going on with them from day do  
25   day.

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1 Q. And do you have requirements for what that  
2 looks like? So, circles should take place a certain  
3 number of times a week, or these check-in check-outs  
4 should take place for every student? What's the  
5 nature of that?

6 A. So we do have a framework, and we're doing a  
7 playbook right now that should be finalized by the  
8 time the staff gets here. We have a time for when we  
9 do circles with the staff. We have a time for when we  
10 do circles with the students. Talk about transition,  
11 how do we transition. The framework takes us through  
12 the whole course of the day and what that looks like.  
13 So we have that in writing by the time the staff gets  
14 back on July 26.

15 Q. Did you have that in place -- I know I think  
16 you said last year you had started implementing this  
17 last year. Was it -- was there a formal structure in  
18 place?

19 A. We had a formal structure, but we didn't  
20 have the structure written all the way out like we're  
21 going to have it written out for FY '23.

22 We got a lot of input from the teachers. We  
23 got a lot of input from the staff. And we even got  
24 input from the students on what the framework should  
25 look like throughout the course of the day and the



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1 week. And that's what we're putting in writing.

2 Q. And does the State Department of Education  
3 provide any training, support, or resources specific  
4 to restorative practices for your program?

5 A. They gave us information. Let me back up.  
6 They gave us information, on all these things you're  
7 asking about, they gave us information on.

8 As far as intensive followup and training  
9 and things like that, I can't say that we've gotten  
10 that up to this point. I can't tell you what happened  
11 prior to and what's planned for the FY '23.

12 Q. Okay. And then one last question about  
13 PBIS, has your program since you've been the director  
14 been recognized as -- in any of the PBIS categories of  
15 distinction?

16 A. So we were identified as a School of  
17 Distinction. They came out. They didn't come out at  
18 the end of '20, but they did come out at the end of  
19 '21. I want to -- they didn't say we were  
20 distinguished, but they didn't say that we lost where  
21 we were.

22 As far as FY '22 the end of this year we  
23 just turned in the information for that at the end of  
24 the month, and so we're waiting to get our  
25 information back on how we did.

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1 Q. Okay. When you say for the end of '21 they  
2 didn't say that you were, but they didn't say you lost  
3 it. So were you previously a School of Distinction?

4 A. We were a School of Distinction, mm-hmm  
5 (affirmative).

6 Q. For the prior school year?

7 A. Yes.

8 Q. Okay. All right.

9 MS. FLETCHER BOWDEN: Do you need a break?

10 THE WITNESS: I'm okay.

11 BY MS. HAMILTON:

12 Q. I want to transition to talk about our site  
13 visits briefly.

14 When we had our -- the United States had  
15 their experts at your facilities, you participated in  
16 the May site visit during which United States brought  
17 their experts; correct?

18 A. Yes.

19 Q. Okay. How long before the site visit did  
20 you learn that the visit would occur?

21 A. Originally I was told that they were going  
22 to be coming in January. And then the -- I want to  
23 say it was probably two or three weeks before. I  
24 can't -- I can't recall the exact time. It was a  
25 relatively short turnaround time for the -- when they

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1 rescheduled.

2 Q. Okay. And then do you recall the visit  
3 ultimately occurred in May --

4 A. May.

5 Q. -- this year; correct?

6 A. Mm-hmm (affirmative).

7 Q. How did you learn about the visit?

8 A. Information was sent to the board attorney,  
9 and they told me.

10 Q. Okay. Did you personally do anything to  
11 prepare for our site visits?

12 A. Well, you always want to brush up on  
13 questions you might have, review the information that  
14 was turned in as part of the subpoena.

15 Q. Did you have any conversations with anyone  
16 on your staff in the GNETS program about our visit in  
17 advance of it occurring?

18 A. I did.

19 Q. Okay. And who did you have those  
20 conversations with?

21 A. Well, the staff. I let the staff know, and  
22 I assured them that they -- nobody was coming to  
23 observe them. We talked about not making any changes  
24 because of you-all coming on site, letting the  
25 students be who the students are.

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1 I let the superintendents know that you-all  
2 were coming on site as a follow-up, part of my update  
3 to follow up and keep them informed about what's going  
4 on.

5 Q. Okay.

6 A. As well as the special ed directors.

7 Q. And you said you let the staff know. Did  
8 you have a meeting with them, or what did that look  
9 like?

10 A. We do our circles. I shared that with them  
11 during a circle. And it might have been the week,  
12 two, three days before y'all came because I didn't  
13 want them to go out and make a whole lot of changes of  
14 things. I wanted them to be aware that you-all were  
15 coming, but I didn't want them to go out and try to  
16 change what we were doing.

17 Q. Okay. Do you know if any class schedules  
18 were changed on account of our visit?

19 A. Huh-uh (negative).

20 Q. Okay. Were any special maintenance requests  
21 put in prior to our visit?

22 A. We typically just turn in information about  
23 general requests anyway, and so that's ongoing  
24 throughout the year.

25 Q. Did you or anyone on your staff have any

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1 conversations with students or families about our  
2 visit prior to our experts coming on site?

3 A. I did not. But I can't say that the  
4 teachers didn't tell them. But I didn't.

5 Q. And do you -- it sounds like you personally  
6 did not. Do you know if any written communication was  
7 shared with any of the students or families alerting  
8 them to the DOJ site visit?

9 A. Not to my knowledge, no.

10 Q. Were any students invited or requested to  
11 stay home on the date of our visits?

12 A. Oh, absolutely not. Those calls would have  
13 gone straight to State. No.

14 Q. Okay.

15 A. Huh-uh (negative).

16 Q. Did you or anyone on your staff have any  
17 conversations regarding the State Department of  
18 Education about our site visits before they occurred?

19 A. I did share with Ms. Stevenson and  
20 Ms. Cleveland that you-all were coming.

21 Q. Did anyone else participate in those  
22 communications?

23 A. That was an email.

24 Q. It was an email?

25 A. Mm-hmm.

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1 Q. And what specifically did you share with  
2 them about our visit?

3 A. I think we had gotten a correspondence  
4 from -- oh, I can't even remember -- updates about  
5 litigation. And so I hadn't heard anything, I didn't  
6 know anything, you know, that was going on.

7 So when I got notified that you-all were  
8 coming in January, I contacted them to say, hey, I  
9 think they're coming on, that they'll be here I think  
10 it was the 13th and the 14th of January. And then I  
11 corresponded with them again, let them know it had  
12 been cancelled, and that I'd let them know when it was  
13 going to be rescheduled. And then when it was  
14 rescheduled, I followed up with them to let them know.

15 Q. And then after our visits when we were  
16 there, there was at least one or more times where I  
17 believe you may have met with some of the personnel  
18 from the State. I think, for example, at the end of  
19 our last visit there may have been a meeting with  
20 Shaun Owen and others?

21 A. You mean on site, or when we --

22 Q. Yes, on site.

23 A. We didn't really meet about anything. After  
24 you-all left that day?

25 Q. At the end of the day. We may not have

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1 necessarily left. But were there any separate  
2 meetings that you would have had with any of the State  
3 personnel?

4 A. Well, I have had meetings with the State  
5 personnel, but --

6 Q. In connection with the site visit?

7 A. No, huh-uh. No, other than, you know, just  
8 being in the room with us after the meeting was over.  
9 I think I came downstairs, and I'm not even sure if  
10 somebody might have been in the bathroom, and we were  
11 just sitting there, and after that I left out to  
12 figure out some of the answers to the questions that  
13 the expert was asking me.

14 Q. Okay. So to your knowledge during those  
15 times there was not discussion about the site visit  
16 itself?

17 A. No, huh-uh (negative).

18 Q. And then you had also mentioned there was  
19 the June 5th meeting among the GNETS directors?

20 A. Mm-hmm (affirmative).

21 Q. Was there any discussion with the GNETS  
22 directors about the DOJ site visits?

23 A. They might have asked who came, which  
24 programs had on-site visits. That was the question  
25 that was asked. But the purpose of the meeting was to

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1 kind of talk about planning for FY '23. And really  
2 the concerns were about the funding.

3 I had mentioned earlier, there was some  
4 questions about funding for FY -- after FY '23, and  
5 that was the focus of the meeting. Even the State  
6 representatives when they came down, they didn't --  
7 they don't ever really talk to us about, you know,  
8 what's going on. And we understand that they can't,  
9 and so we try not to ask them questions about that.  
10 But outside of them saying who had an on-site visit,  
11 there was no discussion. You want to know, hey, what  
12 did y'all talk about, and what did you do? But that  
13 discussion didn't take place.

14 Q. Did you talk to other GNETS directors about  
15 their experiences with our site visits?

16 A. No. But I was going to before I realized  
17 that I was coming up to be subpoenaed, so I haven't  
18 talked to anybody.

19 Q. And in the communication where you did reach  
20 out to Stevenson and Cleveland about our site visit,  
21 did they respond?

22 A. "Thank you." That was it. When I say  
23 they -- we really don't discuss anything that's going  
24 on even as far as updates, say we don't have any  
25 updates about that either.



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1 Q. Okay. Were there any changes that you made  
2 to the program in any way following our visit, or as a  
3 result of our visit?

4 A. It was the end of the school year, so any  
5 changes that we'll make will be implemented FY --  
6 excuse me -- FY '23. So I will say, you know, we  
7 paid -- I paid attention to those things that were  
8 being taken pictures of, that people were taking  
9 pictures of, if there were concerns that might have  
10 come up about or that I felt like were a problem,  
11 those things will be addressed. Questions about  
12 specifically I think the room that had the -- I guess  
13 the bottom part had been -- I don't know if it was  
14 kicked out, pushed out or whatever, you know, going  
15 back in and doing a request to have that repaired so  
16 it looks like the rest of the building.

17 One of the questions that kept coming up was  
18 about a sensory room. We didn't have sensory rooms at  
19 the time, but it was -- I could say that we had that  
20 slated for FY '22 to have -- FY '23 to have one of  
21 those empty classrooms turned into a sensory room for  
22 the students. The staff member in Richmond, she asked  
23 about sensory rooms again. Again, it wasn't  
24 implemented for FY '22, but it will be implemented for  
25 FY '23. And that was something that was already

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1 slated. So some of those things that were asked, we  
2 will be making some arrangements to address that.

3 And going back to your question about did  
4 you have a conversation when I was walking in the  
5 building. After your meeting one of the things that  
6 Ms. Owen did say is that if there is anything that you  
7 think is deficient, now would be the time to go ahead  
8 and correct those things. And so that was the gist of  
9 the conversation that we had when the visit was over.

10 Q. Okay. Is there anything else that you  
11 determined from the visit was deficient that you would  
12 change moving forward?

13 A. Outside of those things that I documented  
14 when pictures were taken, we always want to improve  
15 our program. So those areas where we can support the  
16 teachers who were coming from a non-traditional  
17 educational track, kind of making sure that we really  
18 address that; not that we weren't addressing it  
19 before, but we want the students to have access to the  
20 best possible teachers that we can provide them.

21 The other piece would be just out of  
22 something that you presented to me today and I was,  
23 like, that can't be right; but looking at those kids  
24 who have been there for a number of years, making sure  
25 our data is correct, and then looking to see if we

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1 need to do more to try to address transitioning those  
2 students out of the program.

3 Q. And I guess for that last issue, so I guess  
4 what would be -- like I know you said one component of  
5 that is just ensuring your data is correct.

6 A. Mm-hmm (affirmative).

7 Q. And another component is making sure you're  
8 actually giving student the opportunity to transition.

9 A. Mm-hmm (affirmative).

10 Q. I guess what do you think would lead to a  
11 student being in the GNETS program for multiple years?  
12 Because, again, there were -- I mean, there were the  
13 12 years, there is 11 years, but there was also nine  
14 and eight and seven and five and four. I mean, is  
15 there -- I'll let you answer that part.

16 A. So when I look at that for some of our  
17 students it is -- it may be that that's their least  
18 restricted environment. It may be that that's where  
19 they really need to be, because we look at placement  
20 for students every time we meet.

21 We look at -- when I say every time we meet,  
22 their annual reviews at a minimum, we look at it  
23 annually. But we also look at their data -- when I  
24 tell you we do look-forwards two or three times a day  
25 where we're looking at those levels for students, so

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1 we're doing that daily. And then we're doing the  
2 quarterly summaries, what type of progress are those  
3 students making, so. And if they're failing to make  
4 progress, we going back and adjusting -- should be  
5 going back and adjusting those plans.

6 So when I see that information I'm like,  
7 well, knowing that that's what's supposed to take  
8 place, if they're there for 12 years it may be that  
9 that's where they're supposed to be because that's  
10 their less restricted environment.

11 Q. Okay. After seeing that data, would you go  
12 back and look at those students' records to see why  
13 they have been there that long, assuming it is  
14 accurate?

15 A. I tell you if I had more time, I probably  
16 would have done it today to have them go back and pull  
17 it to make sure, number one, is -- are those -- is  
18 that information accurate.

19 And then if it is accurate, the next step  
20 would be us to have an IEP team -- pull all that data  
21 together, schedule an IEP team meeting, and look at  
22 what's going on with those kids and definitely discuss  
23 transition opportunities for those students in  
24 addition to what the least restrictive environment  
25 might be.

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1 Q. All right. I have some general questions  
2 for you just about how you-all provide educational  
3 services in the Sand Hills program.

4 A. Okay.

5 Q. What is the maximum number of students who  
6 can be in the classroom?

7 A. So for students with emotional behavior  
8 disorder, eight would probably be the maximum without  
9 support. And then above eight we would have a  
10 paraprofessional assigned.

11 Q. Okay. And does the State Department of  
12 Education set any requirements related to the maximum  
13 number of students?

14 A. Not outside of the State rule.

15 Q. And does the State rule set a requirement  
16 about the maximum number?

17 A. It does, mm-hmm (affirmative).

18 Q. Okay. And what is that?

19 A. Eight. And then after eight you have to  
20 have a paraprofessional.

21 Q. Okay. What about the maximum number of  
22 grades that can be served in a classroom? Are there  
23 any state requirements that govern what the range of  
24 those grades or ages can be in a classroom?

25 A. I've -- not to my knowledge, no, I have not

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1 seen that.

2 Q. Okay. And in your program I remember when  
3 we were on site there were often classrooms that had  
4 more than one grade; correct?

5 A. Yes.

6 Q. Okay. What's the typical range?

7 A. We try to keep them between three grade  
8 level spans. So you might see K through 2, or K  
9 through 3, 3 through 5, maybe 4 through 5. Because we  
10 also look at the number of kids we place in those  
11 classes as well. You might see a 4 through 7. You  
12 might, depending on the student's functioning level --  
13 oh, typically 9 through 12th grade would be together.  
14 6 through 8 typically how we're going to have it.

15 Q. And are they all receiving the same  
16 curriculum and instruction?

17 A. No. So the type of instruction that they  
18 would receive would be based on their grade level  
19 standards and what's in their IEP goals, what's in  
20 their IEPs.

21 Q. And does online instruction play a role in  
22 the curriculum for your students?

23 A. Yes. We have the i-Ready program that's  
24 used to kind of monitor students, work on deficit  
25 areas. We use Edgenuity for our high school students,

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1 some middle school students, use Edgenuity as well.

2 Q. And what proportion of instruction is online  
3 versus direct instruction from a teacher?

4 A. I think it varies from teacher to teacher,  
5 but for FY '23 we will have a framework in place  
6 regarding expectations for what we want to see in a  
7 classroom. And, again, we got feedback from the  
8 teachers, we got feedback from the students regarding  
9 what the online instruction would look like.

10 We do have this i-Ready program that we're  
11 bound to use throughout the course of the year. So  
12 we've got a framework on how that is going to be  
13 implemented, what time of day. So the students would  
14 be doing i-Ready Monday -- three days a week to get  
15 their 45 minutes in for reading, and get their  
16 45 minutes in for math.

17 For those students who are using  
18 Edgenuity -- that's primarily at the high school  
19 level -- they'll have two days where they can do  
20 blended learning model. So they have two days where  
21 they can do online, and three days where they have to  
22 have direct instruction.

23 MR. FLETCHER: Andrea, can I interrupt just  
24 a second?

25 (Comments off the record.)

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1 (REPORTER'S NOTE: Mr. Fletcher exited the  
2 deposition at 5:50 p.m.)

3 BY MS. HAMILTON:

4 Q. And so you were just saying for i-Ready you  
5 said that you're bound to use that for a certain  
6 amount of time?

7 A. Mm-hmm (affirmative).

8 Q. Who sets that?

9 A. That's part of the strategic plan that was  
10 provided through the State. That's one of the data  
11 sources that we have to turn into them regarding how  
12 our students are performing academically in E-L -- I  
13 mean, excuse me, in reading and math.

14 Q. Okay. And so is that something that you-all  
15 determined through your strategic plan, or that the  
16 State requires?

17 A. The State requires, but it's also part of  
18 what the school system uses, too, to monitor students'  
19 progress.

20 Q. Okay. And I know you had said that for  
21 fiscal year '23 you're putting in place a framework  
22 for the use of online instruction.

23 A. Mm-hmm (affirmative).

24 Q. This past school year I guess I'm still just  
25 trying to get a general sense of roughly, like, how



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1 much time students would spend doing online  
2 instruction compared to direct instruction?

3 A. I think one of the things that I think I had  
4 said earlier that it varied from teacher to teacher  
5 and student to student. Some of our students would --  
6 and I can't give you an exact percentage, but some of  
7 our students could be online all day and it wouldn't  
8 bother them. For some of our students, they didn't  
9 want the virtual learning, so some of them got the  
10 blended learning model.

11 And when we got feedback from the students  
12 regarding the model, that's the one that we felt like  
13 would meet the needs of all of our students. And I  
14 apologize. I can't give you a definite percentage on  
15 how much they are using i-Ready, and how much they are  
16 using Edgenuity.

17 Q. Are there any State Department of Education  
18 requirements that govern the educational services from  
19 which the GNETS programs are exempt?

20 A. Okay. Ask that question again.

21 Q. Sure. Are there any State Department of  
22 Education requirements that govern any services from  
23 which your program would be exempt? So, for example,  
24 are there any exemptions that apply to GNETS that  
25 wouldn't ordinarily apply in a regular school program?

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1 A. Not to my knowledge. We are bound by the  
2 same requirements.

3 Q. Objection. And do you know if any of the  
4 counties that send students to your GNETS programs are  
5 subject to a -- I believe it's SWSS contract or SWIS  
6 contract?

7 A. You talking about SWIS as in regards to  
8 PBIS?

9 Q. No. In regards to, again, any, like,  
10 approved exemptions where they don't have to meet  
11 certain certification requirements or reporting  
12 requirements through an agreement with the State?

13 A. I'm not familiar with that, but can you give  
14 me S-W-S-S again?

15 Q. Yeah, the initials are S -- I don't know  
16 what it stands for, but the letters are S-W-S-S.

17 MS. FLETCHER BOWDEN: Can I help? It's the  
18 strategic waivers?

19 A. Oh. Then that's different.

20 MS. FLETCHER BOWDEN: Yeah.

21 A. Some of our school systems do have strategic  
22 waivers.

23 THE WITNESS: Richmond County is one, right?

24 MS. FLETCHER BOWDEN: Mm-hmm (affirmative).

25 BY MS. HAMILTON:

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1 Q. And are you aware of whether that impacts  
2 any of the educational services that your students  
3 receive?

4 A. Well, one thing I remember from my special  
5 ed director days is I don't think there are any  
6 strategic waivers for special education teachers,  
7 unless that's changed.

8 THE WITNESS: Do you know if that's still  
9 the case?

10 MS. FLETCHER BOWDEN: I don't think it's --  
11 yeah, it's the same as it is now, and they have  
12 to be, like, recertified.

13 A. Yeah, they have to meet the same criteria.  
14 So it doesn't apply to the program for GNETS.

15 BY MS. HAMILTON:

16 Q. Okay. Okay. Do you-all offer Learn From  
17 Home?

18 A. We have, especially during the pandemic our  
19 students received Learn From Home packets. Our  
20 students participated in Canvas. That's a learning  
21 management system for that Richmond County provided.  
22 Students were -- who had access to computers, the  
23 teachers would log onto Team meetings for them.

24 As a matter of fact, our social emotional  
25 learning lessons this summer were done via Teams. And

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1 so elementary school students from both programs could  
2 log in and participate, middle school and high school.  
3 So the answer is yes.

4 Q. Is that any different from virtual learning?

5 A. So there is -- in Richmond County, they had  
6 a virtual, and I might get this wrong, learning school  
7 that was called -- is it eSchool? They had eSchool.  
8 And so their whole educational program was virtual.  
9 Now, this is Ms. Newsome's version of the difference.

10 Q. Okay.

11 A. Learn From Home was provided when we had to  
12 close the schools, like when we were closed from March  
13 to May, we did Learn From Home. If I had to close a  
14 classroom down or the program down, we did Learn From  
15 Home.

16 Q. Okay.

17 A. And there was specific things we put in  
18 place for that.

19 Q. Okay. I have a few miscellaneous questions  
20 that I want to ask you about how your elementary  
21 students are served compared to your secondary.

22 You answered some of these questions during  
23 our site visits.

24 A. Mm-hmm (affirmative).

25 Q. But I did want to just circle back on a few.

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1                   So just to confirm, for your elementary age  
2 students in both of your sites do they have access to  
3 electives or specials?

4           A.    They all get PE. And that would be the  
5 extent of what they have as far as electives.

6           Q.    Okay. So they don't receive art?

7           A.    Huh-uh (negative).

8           Q.    Or music?

9           A.    Huh-uh (negative).

10          Q.    And neither site has a playground; correct?

11          A.    That's correct.

12          Q.    Okay. The Thomson site did not have a  
13 library?

14          A.    That's correct. They have a mobile lab.

15          Q.    Okay. And that mobile lab comes once a  
16 month?

17          A.    I think the schedule was monthly. I  
18 submitted a schedule for when they come out.

19          Q.    Okay. Let's see. Is there any -- I know  
20 you mentioned that you used to work as a gifted  
21 coordinator for the Richmond County District.

22          A.    Mm-hmm (affirmative).

23          Q.    Are students in the -- elementary school  
24 students in the GNETS program screened for gifted  
25 services?

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1 A. They have not been since I have been here,  
2 but, again, I haven't had that age level. I think  
3 they screen them in the second grade. I haven't had  
4 any second-graders here since I have been here.

5 Q. Okay. And in your elementary program are  
6 all of your students in the same classroom with the  
7 same teacher throughout the day?

8 A. Yes.

9 Q. Do your elementary students get school  
10 photos taken?

11 A. No, they do not.

12 Q. And I know you mentioned one of the areas  
13 you've been trying to work on is parent engagements.

14 A. Mm-hmm (affirmative).

15 Q. Do you have regular events for students and  
16 families?

17 A. We have. I try to do something at least  
18 once a quarter. So, of course, at the beginning of  
19 the year we do open house, and we do a giveaway with.  
20 -- let's see -- with Brown and Gold, whoever they are.  
21 They have adopted our school.

22 So for the past three -- two years they have  
23 donated school supplies for our students. We have --  
24 and the parents can come out on that particular night.

25 COVID kicked back in, and so we did some

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1 virtual surveys for the parents, and we did a couple  
2 of virtual meetings for them. I don't think we did  
3 anything -- oh, at the end of the year we did some  
4 activities where we had parents come in, and -- I  
5 don't want to start crying because it was emotional  
6 for me because I was surprised at the number of  
7 parents who came in. We did Honors Day for our  
8 students. That was on site. It was the first chance  
9 we got to be face to face.

10 And also we did a PBIS celebration for them.  
11 And the parents stayed all day. And so we brought  
12 both sites together. So they came on site for that.  
13 We had a lot of participation for that.

14 Q. Okay.

15 A. And we'll continue to do those types of  
16 things for next year as well.

17 Q. Okay. Do your elementary students have  
18 opportunities to take field trips?

19 A. Not in the past two-and-a-half years, but  
20 they will for FY '23.

21 Q. All right. For your secondary students, do  
22 they change classes, or do they have the same teachers  
23 for their core subjects?

24 A. We started doing that with them, but there  
25 was some restrictions that were put on making sure

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1 that we kept students in the same area because of  
2 contact tracing and all that.

3 So we stopped having the students  
4 transition, and started having the staff transition.  
5 And then we started having issues with staff being  
6 out. And so we stopped the departmental model. But  
7 we're going to pick the departmental model back up for  
8 FY '23. And that will be for middle school and high  
9 school, where they'll have -- we'll probably still let  
10 the teachers switch and not the kids, so.

11 Q. And would that be for every subject, or  
12 would it just depend?

13 A. So it would be for the -- let me see. There  
14 are five -- four. For four of the subjects, yes,  
15 mm-hmm.

16 Q. Okay.

17 A. And every teacher will be responsible for  
18 their own social emotional learning instruction.

19 Q. What are the diploma options available for  
20 graduating in Georgia?

21 A. You have a -- I'm going to call it special  
22 ed diplomas, so each system has identified what they  
23 want to call the diploma that's given to students who  
24 are on special ed track. So because I don't know all  
25 of them, I'm just going to say special ed diploma, but



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1 they are called something else. Excuse me. You have  
2 the regular high school diploma. And I'm not even  
3 sure if we still do certificate of attendance.

4 There used to be an option for certificate  
5 of attendance. And the reason I don't know is because  
6 all of our students receive general ed diplomas. And  
7 I'm going to toot our horn. We had eight graduates  
8 this year between both of the programs. So we're  
9 excited about that all with general ed diplomas.

10 Q. And that's out of how many seniors?

11 A. Let me see. Ooh, that's all of our  
12 graduating seniors because we have, you know, the  
13 students with significant cognitive disabilities can  
14 stay with us until they either have a trans- -- a  
15 post-secondary placement -- hmm. All but one.

16 Q. Mm-hmm (affirmative).

17 A. Because the other one is -- the one student  
18 is coming back. Yeah, all but one.

19 Q. Okay. And do you have any students in that  
20 cohort who have dropped out?

21 A. Not included in those nine students that I'm  
22 talking about. One student withdrew and went to  
23 Pennsylvania. And then we had another student, she  
24 withdrew and went to another GNETS program in Georgia.  
25 So that was two who left.

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1 Q. Okay. For the diploma ceremony, where do  
2 the students graduate from?

3 A. I went to multiple different high schools  
4 because they graduate with their peers at their high  
5 school, whatever zone high school they are from.

6 Q. And do you-all hold a program or ceremony as  
7 well, the GNETS program?

8 A. Not a graduation ceremony, but we did our  
9 Honors Day program.

10 Q. Okay.

11 A. And so we honored, we recognized our seniors  
12 at the Honors program.

13 Q. Okay. Do you offer electives to your  
14 secondary students?

15 A. Their electives are provided virtually  
16 through Edgenuity.

17 Q. And what are those electives that are  
18 provided virtually?

19 A. They have a whole selection of items that  
20 they can -- the students can identify which ones they  
21 want to take. So I couldn't give you the whole list.

22 Q. So, for example, a student could take music?

23 A. Music, PE, art appreciation. It's -- almost  
24 all the ones that would be available to a -- for a  
25 face to face would be available through Edgenuity for

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1     them.

2           Q.     Okay. And so for the examples that you  
3     listed virtually, is there a teacher who's providing  
4     instruction to the students?

5           A.     She's facilitating the instruction. And  
6     that would be the high school teachers.

7           Q.     Okay. And that's all online?

8           A.     Mm-hmm.

9           Q.     So for music, would the students be playing  
10    instruments?

11          A.     No.

12          Q.     You-all don't provide instruments?

13          A.     Well, nobody's asked me for them, but if we  
14    needed them, the schools have been -- the systems have  
15    been very accommodating for anything we asked for as  
16    far as the needs of the students. So if there was a  
17    course that required them to have an instrument, they  
18    would indeed have one.

19                 And it predates me, but they did have a  
20    music teacher on site. I can't remember if they had  
21    instruments or not. But I don't think it would be a  
22    problem for us to get one if they needed them.

23          Q.     But the music programs that are currently  
24    offered as electives through Edgenuity don't require  
25    instruments for secondary students?

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1 A. Nobody's asked for them, so I -- nobody's  
2 asked for them.

3 Q. Okay. And, similarly, for the other  
4 electives in Edgenuity are there additional resources  
5 that students are using while participating in the  
6 courses online?

7 A. When you say other resources, can you be  
8 more specific?

9 Q. Sure. So, for example, for art are they  
10 using art supplies as part of the class, or for PE are  
11 they using equipment as part of the class?

12 A. So we have purchased equipment for PE. The  
13 teachers do their instructional orders, and if they  
14 need some supplies as far as construction papers,  
15 scissors, paint, glue, clay, whatever they need, we  
16 will provide that for them. And they have asked for  
17 some of those items.

18 Q. Okay. For Edgenuity?

19 A. Now, for Edgenuity specific, I can't tell  
20 you that's what it's for. That's just the orders that  
21 I get.

22 Q. I'm just trying to make sure I understand  
23 how the Edgenuity classes work.

24 A. They are virtual. They're computer-based.  
25 I have not had -- so I have not had anybody ask me for

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1 resources to go through the Edgenuity program.

2 Q. Can students take AP or honors courses  
3 through your GNETS Centers?

4 A. We don't - we -- as of this point, we have  
5 not offered them. But if there are students who were  
6 entered, registered in those, we would make sure that  
7 they got them.

8 Q. Okay.

9 A. So they're not ever denied access to it.

10 Q. And this is returning back to Exhibit 195  
11 and 196 about the spreadsheet.

12 A. Mm-hmm (affirmative).

13 Q. But I just wanted to confirm, on the  
14 spreadsheet it indicated that at Thomson there were no  
15 students who participated in extracurricular  
16 activities; is that correct?

17 A. Which year is this?

18 Q. '21 to '22.

19 A. Yes, that's correct.

20 Q. Okay. And at Richmond there were only three  
21 students who participated in extracurricular  
22 activities?

23 A. Yes.

24 Q. Okay. For the Richmond students, what did  
25 that look like?

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1           A.     So we had -- I think they all did football.  
2     So one of our students, he would start his day off  
3     with us, but he would stay over at his zone school and  
4     he would participate in football practice. And the  
5     same -- that's how they all did. They would start  
6     their morning out with us, and then they would go back  
7     to their zone school and participate the rest of the  
8     day and do football practice.

9           Q.     And that was true for all three of those  
10    students, or just that one student?

11          A.     Yes, it was three that did football.

12          Q.     Okay. And do students in the middle school  
13    and high school GNETS program have opportunities to  
14    participate in, like, dances or sporting events at the  
15    local general education schools?

16          A.     Oh, absolutely. They go to the football  
17    games. They go to prom. They are not excluded  
18    because they are in our program. They can  
19    participate, and they have participated.

20          Q.     Like is there any connection to the level  
21    system where they have to earn a certain level where  
22    they can participate in any of those activities?

23          A.     Not since I have been here. As a matter of  
24    fact, unfortunately last year they were going to go to  
25    the prom, and prom got cancelled so they didn't get to

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1 go -- the year when COVID first started prom got  
2 cancelled, and they didn't get to go. And I had a  
3 female student who were going with her escort, and  
4 they were both from our program, they were going to go  
5 together.

6 Q. From the middle school and high school  
7 level, do you-all have yearbooks?

8 A. No.

9 Q. During our deposition you've referenced like  
10 a few places where you might upload things to a portal  
11 or various information systems?

12 A. Mm-hmm (affirmative).

13 Q. What are the main systems that you use for  
14 the GNETS program?

15 A. You want to know student -- and from  
16 students as well?

17 Q. For purposes of, like, collecting data  
18 related to student -- GNETS students or scheduling or  
19 records in general?

20 A. It would be the GaDOE portal. That's the  
21 only place where we're uploading information. If  
22 there's information -- but there are multiple areas  
23 within the portal that you could upload information.  
24 So if there is student information that I need to send  
25 that includes demographic or special identifiers for

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1 the students, I would send those, upload those in the  
2 portal and I could email them there.

3 If there are documents that I need to upload  
4 regarding a grant that I have to complete, I would go  
5 to the grant and there is an area that has  
6 attachments. You can upload them there. So the  
7 information is uploaded into the GaDOE portal.

8 Q. Okay. And is that where you would upload  
9 like your i-Ready data --

10 A. Mm-hmm, yes.

11 Q. -- into?

12 A. Upload i-Ready data to that as well.

13 Q. Okay.

14 A. But they also have access to our -- the  
15 i-Ready program that we're using, the -- it comes  
16 straight from the Department of Education, the GNETS  
17 program. And so Ms. Stevenson -- Dr. Stevenson and  
18 Mrs. Cleveland can actually go in and look at the data  
19 as well. They have administrative rights.

20 Q. And are you involved in creating the GNETS  
21 Annual Accountability report?

22 A. No.

23 Q. Okay. Or any sort of Comprehensive Needs  
24 Assessment report?

25 A. Mm-hmm (affirmative).



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1 Q. Are you ever asked to prepare reports, or  
2 consult with anyone on the governor's staff?

3 A. No.

4 Q. Are you ever asked to prepare reports or  
5 consult with anyone in the State legislature?

6 A. This past year we were asked to get  
7 information together. And that was specifically -- I  
8 think I mentioned earlier about the funning concerns.  
9 We were asked to get information together for that.

10 Q. Okay. And was that information given to the  
11 State legislature?

12 A. Before we could submit, before we could move  
13 forward with submitting, a decision had already been  
14 made, and we didn't have to submit anything. They may  
15 come back later on and ask for it, I don't know.

16 Q. Okay. Do you know who from the legislature  
17 had requested that information?

18 A. I don't.

19 Q. And I think you had mentioned earlier that  
20 you may have been in -- like, this was in connection  
21 with your meeting with the State Department of  
22 Education representatives --

23 A. Well, the --

24 Q. -- and the other GNETS directors.

25 A. Well, the request came before we had our

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1 meeting.

2 Q. Okay.

3 A. Because it happened right around -- right  
4 around spring break time. So it was between March and  
5 April, or right before March because we got notified  
6 that funding would be provided while I was out for  
7 spring break, so it was that first week in April. So  
8 I didn't get to turn it in -- I didn't have to turn it  
9 in to anybody for this upcoming school year. I don't  
10 know what's going to happen for next year.

11 Q. Okay. And when you say that you received a  
12 request, was this by email, or in writing in some  
13 form?

14 A. Oh, goodness. It might have been through  
15 one of the meetings that we had. There was an email  
16 that was generated from the RESA director on some  
17 things that we could do to try to prepare to get  
18 information from the legislature.

19 So she sent information out, and she sent us  
20 a document on what that would look like on, you know,  
21 how to gather the information and what to turn in.

22 Excuse me.

23 Q. Mm-hmm (affirmative).

24 Do you have any communication with your  
25 State Board of Education representative?

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1 A. No.

2 Q. Okay. And who is that person?

3 A. I have no idea.

4 Q. Do you receive periodic performance  
5 evaluations?

6 A. For my performance, I do.

7 Q. For your role as the director?

8 A. Mm-hmm (affirmative).

9 Q. And who oversees that process for you?

10 A. My supervisor. It was Dr. Barnes last year.  
11 It will be Mr. Allen this year.

12 Q. And they're both, as you mentioned earlier,  
13 with the Richmond County Department?

14 A. Mm-hmm (affirmative).

15 Q. Do you have any sort of evaluation performed  
16 by the State Department of Education specific to your  
17 role as director?

18 A. I have not received one as of today.

19 Q. Do you know if there is a process for  
20 evaluating the directors?

21 A. I don't, huh-uh, other than making sure that  
22 we go through the process through our platform that's  
23 a -- back to GaDOE, there is a TKES platform in  
24 there --

25 Q. Mm-hmm (affirmative).

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1           A.     -- that we use that information. And I  
2 think we're all supposed to be using the LKES  
3 evaluation system.

4           REPORTER: I'm sorry, say that again, the  
5 "leaks evaluation"?

6           A.     Leader Keys Evaluation System, the LKES.  
7 LKES.

8           MS. HAMILTON: Can I just have one moment?

9           MS. FLETCHER BOWDEN: Sure.

10          THE VIDEOGRAPHER: Off the record?

11          MS. HAMILTON: Yes.

12          THE VIDEOGRAPHER: Stand by. Off the record  
13 at 6:14 p.m.

14          (Recess 6:17 p.m. - 6:18 p.m.)

15          THE VIDEOGRAPHER: Back on the record at  
16 6:18 p.m.

17 BY MS. HAMILTON:

18          Q.     All right. Mrs. Newsome, we are almost  
19 ready to wrap up. We just have a few final questions  
20 for you.

21          A.     Okay.

22          Q.     So I know you had referenced various  
23 trainings earlier, and we didn't get to spend much  
24 time on this. But are your staff trained in  
25 de-escalation techniques?

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1 A. Yes.

2 Q. What does that training look like and who  
3 provided it?

4 A. So we have certified staff who are trained  
5 in -- the training model for MindSet, and they come  
6 back out and we deliver at the beginning of every  
7 year, midyear and any time there is a need in between.  
8 The staff that we send for MindSet training, they are  
9 certified and they have to be recertified for --  
10 depending on the number of years you've been a  
11 trainer, you're either certified every year --  
12 recertify every year, or every two years, depending on  
13 where you are.

14 Anybody who comes in after we do the initial  
15 training, we go back and get them trained within a  
16 week of their coming on site because we had a lot of  
17 people who started after school started, so we had to  
18 come back and train them. We try to get all that  
19 training done during preplanning so that the staff  
20 receive that training before the students get here.

21 Q. Okay. Does the State Department of  
22 Education require that your staff receive  
23 de-escalation training in some form?

24 A. It is one of those items that's on our  
25 strategic plan.

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1 Q. And does the State Department of Education  
2 monitor the program's use of physical restraint or  
3 and/or seclusion?

4 A. Yes. We collect data and turn that in to  
5 them annually.

6 Q. Okay. How's that data used by the state?  
7 Do they provide feedback, or?

8 A. I have not received feedback from the State  
9 on how that information is used.

10 Q. And is that data that also goes into the  
11 Ga- -- I guess GaDOE portal that you mentioned?

12 A. It is.

13 Q. Is it an area where you could receive  
14 feedback in connection with the strategic plan?

15 A. It is.

16 Q. Have you-all received any feedback?

17 A. No.

18 Q. Are there any State Department of Education  
19 operation manuals that have been provided to your  
20 program for GNETS?

21 A. Not specific for GNETS. No, not specific  
22 for our program.

23 Q. And are you familiar with an Operations  
24 Manual that was created in fiscal year '14?

25 A. I am.

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1 Q. Okay. Is that an Operations Manual that is  
2 still used by your program?

3 A. It's referenced. If I have questions about  
4 something just for historical, I might go in and look  
5 at that information.

6 Q. Okay. So it is a -- it is still a valid  
7 resource that programs can use?

8 A. Oh, absolutely. There is some good  
9 information in there.

10 Q. Do you think that any of the students who  
11 are in your GNETS program could be served in more  
12 integrated settings with appropriate services and  
13 supports?

14 A. Yes. And those would be the students that  
15 we're going to be meeting on at the beginning of the  
16 year to talk about a transition for them.

17 Q. Are there any obstacles that you think exist  
18 to them being able to be served successfully in more  
19 integrated settings?

20 A. I have not encountered any up to this point,  
21 so up to this point I would say no.

22 MS. FLETCHER BOWDEN: Did you mean just  
23 those students, or all of her -- because the  
24 first question was --

25 MS. HAMILTON: Yeah.

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1 MS. FLETCHER BOWDEN: -- you were talking  
2 about the ones ready, so. That wasn't -- I  
3 wasn't sure which one you meant.

4 MS. HAMILTON: No. Thank you for  
5 clarifying.

6 BY MS. HAMILTON:

7 Q. I really meant both. So I guess first  
8 starting with the students who you are trying to  
9 transition are there any obstacles that you're aware  
10 of that might prevent them from being served in more  
11 integrated settings?

12 A. No.

13 Q. And then I guess just in general, for the  
14 student population that you serve do you feel that  
15 there are obstacles to them being served in more  
16 integrated settings, generally?

17 A. No. What I found has been very helpful is  
18 that regardless of which site or school or program or  
19 school system I'm working with, as long as we're  
20 sitting down talking about those students' progress,  
21 we've been communicating along the way about, you  
22 know, what's going on with those students, we haven't  
23 encountered any concerns about students transitioning.

24 Q. Ideally for the population of students that  
25 you serve, for them to be successful in a general



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1 education setting what types of services and supports  
2 would they need?

3 A. All of their needs are so individualized.  
4 But if I had to come up with something in general, one  
5 of the things that I would say is that those  
6 therapeutic supports and services that are available  
7 ongoing throughout the day is something that they  
8 would need. Staff who are trained in the nature and  
9 characteristics of students with emotional and  
10 behavior disorders, regardless of where they are in  
11 the building, would definitely be something that  
12 would -- would be needed. Understanding the impact of  
13 trauma in the classroom and how do you address that  
14 for students would be an area that they would need  
15 support in, addressing the mental health needs of  
16 students, how do you deal with a child in crisis, that  
17 verbal de-escalation piece would be one of those  
18 areas.

19 I think academically the teachers are  
20 equipped to deal with them in a -- I guess you're  
21 saying a non-GNETS program?

22 Q. Correct.

23 A. I think academically they would be okay  
24 trying to address those needs. It's those other areas  
25 regarding emotionality that they would need additional

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1 support available throughout the school day as needed.

2 Q. Are there any additional services and  
3 supports that you're providing in the GNETS program  
4 that you believe could be, you know, funding issues  
5 aside, could be provided in a general education  
6 setting to support this population of students?

7 A. Funding aside, all of those things I just  
8 mentioned would definitely need to be available to  
9 those students.

10 Q. Okay. All right. I think we can end.  
11 Thank you so much, Ms. Newsome.

12 MS. FLETCHER BOWDEN: Thank you.

13 MS. HAMILTON: We very much appreciate your  
14 time today.

15 THE WITNESS: Oh, yay.

16 MS. FLETCHER BOWDEN: All right. Now, you  
17 run --

18 THE VIDEOGRAPHER: You ready to go off the  
19 record and all of that?

20 MS. HAMILTON: Yes.

21 THE VIDEOGRAPHER: Okay. So it sounds like  
22 we're in agreement to conclude Ms. -- I want to  
23 say her name -- Talithia Newsome's deposition on  
24 July 12th, 2022 at 6:27 p.m.

25 (Deposition concluded at 6:27 p.m.)

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## ERRATA PAGE

Civil Action No. 1:16-cv-03088-ELR

CASE CAPTION: United States vs. State of Georgia

DEPONENT: TALITHIA NEWSOME

DATE: July 12, 2022

I, the undersigned, do hereby certify that I have read, or have had read to me, the transcript of my testimony, and that:

- 1) There are no changes noted.
- 2) The following changes are noted:

Pursuant to Rule 30(e) of the Federal Rules of Civil Procedure and/or the Official Code of Georgia Annotated § 9-11-30(e), any changes in form or substance which you desire to make shall be entered upon the deposition with a statement of the reasons given for making them. To assist you in making any such corrections, please use the form below. If additional pages are necessary, please furnish same and attach them to this sheet.

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TALITHIA NEWSOME

Sworn to and subscribed before me,

This the            day of            , 2022.

Notary Public

My commission expires:

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C E R T I F I C A T E

STATE OF GEORGIA:

DEKALB COUNTY:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to the written page under my direction; that the foregoing pages 1 through 347 represent a true and correct transcript of the evidence given. I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I anyway interested in the result of said case. The witness did reserve the right to read and sign the transcript.

This, 18th day of July, 2022.



MAUREEN S. KREIMER, CCR-B-1379  
Notary Public in and for the  
State of Georgia. My Commission  
Expires August 14, 2024.

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DISCLOSURE

STATE OF GEORGIA:  
COUNTY OF DEKALB:

Deposition of TALITHIA NEWSOME

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MAUREEN S. KREIMER, CCR B-1379  
Date: July 12, 2022

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